

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RØDE MICROPHONES, LLC AND
FREEDMAN ELECTRONICS PTY LTD,
Petitioners

v.

ZAXCOM, INC.,
Patent Owner.

IPR2025-00230

Patent 7,711,443

PETITIONERS' OBJECTIONS TO EVIDENCE FILED
WITH PATENT OWNER'S RESPONSE

Pursuant to 37 C.F.R. § 42.64(b)(1) and the Federal Rules of Evidence (“FRE”), Petitioners RØDE Microphones, LLC and Freedman Electronics Pty Ltd (“RØDE” or “Petitioners”) hereby object to the admissibility of certain evidence provided with Patent Owner’s Response filed by Zaxcom, Inc. (“Zaxcom” or “Patent Owner”).

EXHIBIT 2029 (Declaration of Glenn Norman Sanders)

Petitioners object to Exhibit 2036 as improper opinion testimony by a lay witness under FRE 701.

Petitioners further object to Exhibit 2029 as inadmissible expert testimony under FRE 702 and 703 and the United States Supreme Court’s decision in *Daubert v. Merrel Dow Pharms., Inc.*, 509 U.S. 579 (1993).

EXHIBIT 2030 (Swearing Behind Declaration of Rita C. Chipperson)

Petitioners object to Exhibit 2030 as improper testimony on contested issues by Zaxcom’s attorney in violation of Rule 3.7 of the attorney Rules of Professional Conduct of New Jersey and New York, and ABA Model Rule 3.7.

Petitioners further object to Exhibit 2030 as testimony by a witness lacking personal knowledge under FRE 602.

Petitioners object to ¶ 4 of Exhibit 2030 as improper opinion testimony by a lay witness under FRE 701.

Petitioners object to Exhibit 2030 as irrelevant under FRE 401, 402, and 403 because it cannot properly address any issue relevant to the case.

EXHIBIT 2031 (File Explorer Screenshot)

Petitioners object to Exhibit 2031 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2031 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2031. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

Exhibit 2032 (05.05.09 Wireless microphone system.revised.draft.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2032 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority

date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2032. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

Exhibit 2033 (05.05.10.FIG.2A.aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2033 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2033 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2033. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2034 (05.05.10.FIG3.aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2034 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2034 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2034. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2035 (05.05.10.FIG.5aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2035 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2035.

Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2036 (05.10m FIG.4.aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2036 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2036. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2037 (05.05.10.Wireless Microphone
System.revised.draft.backup.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2037 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority

date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2037. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2038 (05.05.10.Wireless Microphone System.revised.draft.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2038 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2038. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2039 (05.05.13.Wireless Microphone System.revised.draft.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2039 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2039. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2040 (05.05. 13.Wireless Multitrack Recording System.Detailed Description.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2040 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2040. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2041 (05.05.13.Wireless Multitrack Record.FIG 3.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2041 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2041 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2041. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2042 (05.05.16.FIG.2A.aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2042 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2042 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030)

is inadmissible, it can neither authenticate nor establish the date of Exhibit 2042. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2043 (05.05.16.FIG4.aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2043 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2043. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2044 (05.05.16.FIG.5aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2044 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority

date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2044. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2045 (05.05.16.Wireless Microphone System.revised.draft.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2045 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2045. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2046 (05.05.16.Wireless Recording System Det Desc Emailed to Client.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2046 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2046. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2048 (05.07.12 Zaxcom Virtual Recording System Final draft w Howy changes rcc)

Petitioners further object to Exhibit 2048 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2048. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2049 (05.07.12 Zaxcom Virtual Recording System. final draft.rcc)

Petitioners further object to Exhibit 2049 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2049. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2050 (05.07.12.ZXC-001.Figures.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2050 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2050.

Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2051 (Fax Cover Sheet from Chipperson to Sanders dated July 11, 2005)

Petitioners object to Exhibit 2051 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2051 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2051. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2052 (Webpage with a product description of “Deva – The Next Generation”)

Petitioners object to Exhibit 2052 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2052 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2052. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2053 (Unlabeled Image)

Petitioners object to Exhibit 2053 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2053 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2053. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2054 (05.07.08.zxc-001 chipperson)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2054 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2054. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2055 (05.07.08 Zaxcom Virtual Recording System.clean.rcc)

Petitioners further object to Exhibit 2055 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2055. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2056 (05.07.08 Zaxcom Virtual Recording System.marked

up.rcc)

Petitioners further object to Exhibit 2056 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2056. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2057 (05.07.08 Zaxcom Virtual Recording System.backup.rcc)

Petitioners further object to Exhibit 2057 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2057. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2058 (05.07.07 Zaxcom Virtual Recording System.backup.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2058 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2058. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2059 (05.07.07 Zaxcom Virtual Recording System.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2059 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2059.

Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2060 (Fax Cover Sheet from Chipperson to Sanders dated July 7, 2005)

Petitioners further object to Exhibit 2060 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2060 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2060. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2061 (05.07.06 Zaxcom Virtual Recording System.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2061 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2061. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2062 (05.07.05 Zaxcom Virtual Recording System.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2062 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2062. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2063 (zxc-001 chipperson)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2063 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2063. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2064 (05.06.22 FIG 4-5 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2064 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2064. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2065 (05.06.24 FIG 10 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2065 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2065. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2066 (05.06.24 FIG 9 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2066 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2066.

Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2067 (05.06.24 FIG 7 aes (2))

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2067 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2067. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2068 (05.06.22 FIG 6 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2068 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030)

is inadmissible, it can neither authenticate nor establish the date of Exhibit 2068.

Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2069 (05.06.27 Letter To Draftsperson.Bob.Fax Coversheet)

Petitioners further object to Exhibit 2069 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2069 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2069. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2070 (05.06.24 Virtual Recording System. Det Desc.Final.Emailed to Client for review.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2070 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2070. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

**EXHIBIT 2071 (05.06.24 Wireless Recording System Det Desc Revised
Figures rcc)**

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2071 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2071. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2072 (05.06.24.PartialWireless Recording System Det Desc

Revised Figures rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2072 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2072. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2073 (05.06.23 Wireless Recording System Det Desc Revised

Figures rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2073 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030)

is inadmissible, it can neither authenticate nor establish the date of Exhibit 2073. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2074 (05.06.23.FIG 10 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2074 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2074. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2075 (05.06.23.FIG 9 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2075 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority

date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2075. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

**EXHIBIT 2076 (05.06.22 Wireless Recording System Det Desc Revised
Figures 7 9 and 10 rcc)**

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2076 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2076. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2077 (05.06.23 FIG 7 aes (2))

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2077 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2077. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2078 (05.06.23 FIG 3 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2078 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2078. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2079 (05.06.22 FIG 3 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2079 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2079. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2080 (05.06.22 FIG 7 aes (2))

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2080 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2080. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2081 (05.06.22 FIG 10 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2081 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2081. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2082 (05.06.22 9 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2082 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2082.

Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2083 (05.06.22 FIG 8 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2083 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2083. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

**EXHIBIT 2084 (05.06.22 Wireless Recording System Det Desc Revised
Figures rcc)**

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2084 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority

date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2084. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2085 (05.06.22.FIG.2A.aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2085 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2085. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2086 (05.06.03.FIG.2A.aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2086 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2086. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

**EXHIBIT 2087 (05.06.21 Wireless Recording System Det Desc Revised
Figures rcc)**

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2087 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2087. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2088 (05.06.20.FIG. 4.aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2088 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2088. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

**EXHIBIT 2089 (05.06.20 Wireless Recording System Det Desc Revised
Figures rcc)**

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2089 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2089. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2090 (05.05.20.Wireless Multitrack Recording System.FIG.

3.rcc.vsd)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2090 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2090. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2091 (05.06.17.FIG. 4.aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2091 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2091.

Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2092 (05.06.20.Mixing System FIG. 3 aes.vsd)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2092 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2092. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2093 (05.06.02.Mixing System FIG. 3 aes.vsd)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2093 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030)

is inadmissible, it can neither authenticate nor establish the date of Exhibit 2093.

Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2094 (05.05.16.Wireless Multitrack Recording System.FIG.

3.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2094 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2094. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2095 (05.06.17.FIG. 5 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2095 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2095. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2096 (05.06.18.FIG. 7 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2096 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2096. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2097 (05.06.18.FIG. 8 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2097 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2097. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2098 (05.06.18.FIG. 6 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2098 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2098. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2099 (05.06.18.FIG. 9 aes)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2099 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2099. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2100 (Page 1 of document entitled “Flowchart depicting operation of TRX900 in Synchronous Timecode Generator mode”)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2100 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2100 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority

date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2100. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2101 (Page 2 of document entitled “Flowchart depicting operation of TRX900 in Synchronous Timecode Generator mode”)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2101 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2101. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2102 (Page 3 of document entitled “Flowchart depicting operation of TRX900 in Synchronous Timecode Generator mode”)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2102 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2102. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2103 (Page 4 of document entitled “Flowchart depicting operation of TRX900 in Synchronous Timecode Generator mode”)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2103 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2103. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2104 (Page 5 of document entitled “Flowchart depicting operation of TRX900 in Synchronous Timecode Generator mode”)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2104 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2104. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2105 (05.06.03 Wireless Multi-Track Recording System.FIG. 3.rcc)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2105 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030)

is inadmissible, it can neither authenticate nor establish the date of Exhibit 2105.

Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2106 (Photograph of Device Bearing Zaxcom Logo)

Petitioners object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no evidence that it existed before the priority date of the '443 Patent. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

Petitioners further object to Exhibit 2106 as unauthenticated under FRE 901 and 902.

EXHIBIT 2107 (Diagram of Device Bearing Zaxcom Logo)

Petitioners object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no evidence that it existed before the priority date of the '443 Patent. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

Petitioners further object to Exhibit 2107 as irrelevant under FRE 401, 402, and 403 because neither Patent Owner nor its expert have cited it to address any issue relevant to the case.

Petitioners further object to Exhibit 2107 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2107 as unauthenticated under FRE 901 and 902.

EXHIBIT 2108 (Webpage entitled “Zaxcom, Inc. is proud to introduce the TRX900 Wireless Microphone with integrated IFB, remote control, time-code and recording. Pat. Pend.”)

Petitioners object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no evidence that it existed before the priority date of the '443 Patent. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

Petitioners further object to Exhibit 2108 as irrelevant under FRE 401, 402, and 403 because neither Patent Owner nor its expert have cited it to address any issue relevant to the case.

Petitioners further object to this document as irrelevant under FRE 401, 402, and 403 because the document is undated and thus there is no evidence that it is contemporaneous with the 2005 filing date of the patents-in-suit. Accordingly, it is not relevant to the construction of any claim term. *See, e.g., Brookhill-Wilk 1, LLC v. Intuitive Surgical, Inc.*, 334 F.3d 1294, 1299 (Fed. Cir. 2003) (“[N]on-

contemporaneous authorities,...dated well after the [filing date of the] patent,...are not contemporaneous with the patent, do not reflect the meanings that would have been attributed [by POSAs] as of the grant of the...patent, and for those reasons are not considered in our...claim construction analysis.”); *Intellicheck Mobilisa, Inc. v. Wizz Sys., LLC*, 173 F. Supp. 3d 1085, 1098 (W.D. Wash. 2016) (“IDScan pulls this definition from non-technical online dictionaries accessed almost twenty years after the initial application for the ’623 Patent....As such, IDScan’s definition is not persuasive evidence...”); *Gemak Trust v. Reckitt Benckiser LLC*, Nos. 18-1855-RGA, 18-1854-RGA, 2020 WL 4284973, at *4 n.5 (D. Del. July 27, 2020) (rejecting non-contemporaneous extrinsic evidence).

Petitioners further object to Exhibit 2108 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2108 as unauthenticated under FRE 901 and 902.

EXHIBIT 2109 (Video Presentation)

Petitioners object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no evidence that it existed before the priority date of the ’443 Patent. Therefore, this exhibit is not relevant to conception, diligence, or reduction to practice.

Petitioners further object to Exhibit 2109 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2109 as unauthenticated under FRE 901 and 902.

Petitioners further object to Exhibit 2109 as improper opinion testimony by a lay witness under FRE 701.

Petitioners further object to Exhibit 2109 as inadmissible expert testimony under FRE 702 and 703 and the United States Supreme Court's decision in *Daubert v. Merrel Dow Pharms., Inc.*, 509 U.S. 579 (1993).

EXHIBIT 2110 (Photograph of Emmy Award)

Petitioners object to Exhibit 2110 as unauthenticated under FRE 901 and 902.

EXHIBIT 2111 (Photograph of Emmy Award)

Petitioners object to Exhibit 2111 as unauthenticated under FRE 901 and 902.

EXHIBIT 2112 (Photograph of Emmy Award)

Petitioners object to Exhibit 2112 as unauthenticated under FRE 901 and 902.

EXHIBIT 2113 (Photograph of Technical Achievement Award)

Petitioners object to Exhibit 2113 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2113 as unauthenticated under FRE 901 and 902.

EXHIBIT 2114 (Photograph of Technical Achievement Award)

Petitioners object to Exhibit 2114 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2114 as unauthenticated under FRE 901 and 902.

EXHIBIT 2115 (Document entitled “MC68HC11G Technical Data”)

Petitioners object to this exhibit as irrelevant under FRE 401, 402, and 403 because it is undated and thus there is no evidence that it is contemporaneous with either Strub or the 2005 filing date of the patents-in-suit. Accordingly, it is not relevant to the capabilities or characteristics of any device in the relevant time period.

Petitioners further object to Exhibit 2115 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2115 as unauthenticated under FRE 901 and 902.

EXHIBIT 2116 (Document entitled “Seagate Barracuda 9LP Family Product Manual, Volume 1”)

Petitioners object to Exhibit 2116 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2116 as unauthenticated under FRE 901 and 902.

EXHIBIT 2117 (Webpage entitled “PC17YC High Resolution Micro Video Camera”)

Petitioners object to Exhibit 2117 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2117 as unauthenticated under FRE 901 and 902.

EXHIBIT 2118 (Document entitled “A Versatile Digital Video Engine for Safeguards and Security Applications”)

Petitioners object to this exhibit as irrelevant under FRE 401, 402, and 403 because it is undated and thus there is no evidence that it is contemporaneous with either Strub or the 2005 filing date of the patents-in-suit. Accordingly, it is not relevant to the capabilities or characteristics of any device in the relevant time period.

Petitioners further object to Exhibit 2118 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2118 as unauthenticated under FRE 901 and 902.

EXHIBIT 2120 (Version served on 9/8/2025 with Patent Owner's Response (document entitled "Qi: Mobile charging empowered"))

Petitioners object to this exhibit as irrelevant under FRE 401, 402, and 403 because it refers to events occurring in July 2025 and thus was created too late to be relevant to any issue in this case.

Petitioners further object to Exhibit 2120 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2120 as unauthenticated under FRE 901 and 902.

EXHIBIT 2120 (Version served by e-mail on 9/12/2025 (Wayback Machine October 23, 1999 archive of webpage entitled "Zaxcom Wireless"))

Petitioners object to Exhibit 2120 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2120 as unauthenticated under FRE 901 and 902.

EXHIBIT 2123 (Document entitled “Panasonic Owner’s ManualWearable Camera Model No. HX-A500”)

Petitioners object to this exhibit as irrelevant under FRE 401, 402, and 403 because it is undated and thus there is no evidence that it is contemporaneous with either Strub or the 2005 filing date of the patents-in-suit. Accordingly, it is not relevant to the capabilities or characteristics of any device in the relevant time period.

Petitioners further object to Exhibit 2123 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2123 as unauthenticated under FRE 901 and 902.

EXHIBIT 2126 (Jeffrey Wexler Declaration)

Petitioners object to Exhibit 2126 as improper opinion testimony by a lay witness under FRE 701.

Petitioners further object to Exhibit 2126 as inadmissible expert testimony under FRE 702 and 703 and the United States Supreme Court’s decision in *Daubert v. Merrel Dow Pharms., Inc.*, 509 U.S. 579 (1993).

EXHIBIT 2127 (William Sarokin Declaration)

Petitioners object to Exhibit 2127 as improper opinion testimony by a lay witness under FRE 701.

Petitioners further object to Exhibit 2127 as inadmissible expert testimony under FRE 702 and 703 and the United States Supreme Court's decision in *Daubert v. Merrel Dow Pharms., Inc.*, 509 U.S. 579 (1993).

EXHIBIT 2128 (Document entitled "Engineering Emmys")

Petitioners object to Exhibit 2128 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2128 as unauthenticated under FRE 901 and 902.

EXHIBIT 2129 (Engineering Emmy Awards Press Release)

Petitioners object to Exhibit 2129 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2129 as unauthenticated under FRE 901 and 902.

EXHIBIT 2130 (Engineering Emmy Awards Entry Form)

Petitioners object to Exhibit 2130 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2130 as unauthenticated under FRE 901 and 902.

EXHIBIT 2131 (Document entitled “User’s Manual TRX900AA Digital Transmitter”)

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because it is dated June 2013 and thus cannot be relevant to conception, diligence, or reduction to practice.

Petitioners object to Exhibit 2131 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2131 as unauthenticated under FRE 901 and 902.

EXHIBIT 2132 (Document entitled “User’s Manual TRX900LA & TRX900LAS Digital Recording Transmitter”)

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because it is dated May 2013 and thus cannot be relevant to conception, diligence, or reduction to practice.

Petitioners object to Exhibit 2132 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2132 as unauthenticated under FRE 901 and 902.

EXHIBIT 2133 (Document entitled “Engagement Agreement”)

Petitioners object to Exhibit 2133 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2133 as unauthenticated under FRE 901 and 902.

EXHIBIT 2134 (Document entitled “Audio recording wireless microphone system with timecode reference. Case 1”)

Petitioners object to Exhibit 2134 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2134 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2031, which Zaxcom contends proves the date of Exhibit 2134. Therefore, Exhibit 2134 is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2135 (Untitled Flowchart)

Petitioners object to this document as incomplete under FRE 106.

Petitioners further object to Exhibit 2135 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2135 as unauthenticated under FRE 901 and 902.

Petitioners further object to this exhibit as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that it existed before the priority date of the '443 Patent. For example, since the Chipperson declaration (Ex. 2030) is inadmissible, it can neither authenticate nor establish the date of Exhibit 2031, which Zaxcom contends proves the date of Exhibit 2135. Therefore, Exhibit 2135 is not relevant to conception, diligence, or reduction to practice.

EXHIBIT 2136 (Webpage entitled “Tiernan Video SE4000 MPEG-2 DVB Video Encoder System”)

Petitioners object to this exhibit as irrelevant under FRE 401, 402, and 403 because the date range listed on it is 1998-2020—a range of 22 years—and thus there is no evidence that it is contemporaneous with either Strub or the 2005 filing date of the patents-in-suit. Accordingly, it is not relevant to the capabilities or characteristics of any device in the relevant time period.

Petitioners further object to Exhibit 2136 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2136 as unauthenticated under FRE 901 and 902.

EXHIBIT 2137 (Document entitled “1/3” 3-CCD DV Camcorder GY-DV300U Network Pack KA-DV300U”)

Petitioners object to this exhibit as irrelevant under FRE 401, 402, and 403 because it is undated and thus there is no evidence that it is contemporaneous with either Strub or the 2005 filing date of the patents-in-suit. Accordingly, it is not relevant to the capabilities or characteristics of any device in the relevant time period.

Petitioners further object to Exhibit 2137 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2137 as unauthenticated under FRE 901 and 902.

EXHIBIT 2138 (Webpage entitled “Look YouTube, No Hands! Loxcie Introduces Wearable Camcorder”)

Petitioners object to Exhibit 2138 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2138 as unauthenticated under FRE 901 and 902.

EXHIBIT 2139 (Document entitled “New Series DSR-500WS/500WSP DSR-300A/300AP”)

Petitioners object to Exhibit 2139 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2139 as unauthenticated under FRE 901 and 902.

EXHIBIT 2142 (Webpage entitled “Lectrosonics Announces Firmware Updates For Select Transmitters To Record & Transmit Simultaneously For Markets Outside Of The United States”)

Petitioners object to Exhibit 2142 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2142 as unauthenticated under FRE 901 and 902.

EXHIBIT 2143 (Webpage entitled “Sound Devices A10-TX-BU Digital Bodypack Transmitter – B – band”)

Petitioners object to Exhibit 2143 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2143 as unauthenticated under FRE 901 and 902.

EXHIBIT 2145 (Document entitled “User Guide Camera 100”)

Petitioners object to Exhibit 2145 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2145 as unauthenticated under FRE 901 and 902.

Dated: September 15, 2025

/ Michael A. Fisher /
Jeffrey B. Plies, reg. no. 46,999
Michael A. Fisher, reg. no. 42,536
DECHERT LLP
Counsel for Petitioners

CERTIFICATE OF SERVICE

I certify that today in:

RØDE Microphones, LLC., et al. v, Zaxcom, Inc., IPR2025-00230 (U.S.
Patent 7,711,443)

I caused to be served a copy of the foregoing Petitioners' Objections to Evidence
Filed With Patent Owner's Response upon:

ZAXCOM INC., c/o:

Rita Chipperson - rcc@chippersonlaw.com

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via:

Electronic Mail

Patent Owner agreed to have the above-listed counsel accept electronic
service of papers filed in this IPR, by e-mail on November 20, 2024, and by
Patent Owner's Mandatory Notices of December 23, 2024. *See* 37 CFR §
42.105(b) ("Upon agreement of the parties, service may be made
electronically....").

Dated: September 15, 2025

By: /Michael A. Fisher/

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