

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 PATENT OWNER'S SUPPLEMENTAL
EVIDENCE**

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 supplemental evidence served by Zaxcom, Inc. (“Zaxcom” or “Patent Owner”).

EXHIBIT 2147 (Declaration of Morgan Golightly)

Petitioners object to Exhibit 2147 under FRE 602 because Ms. Golightly lacks personal knowledge of (1) the origin and/or maintenance before 2020 of the documents on which she testifies—*i.e.*, Exs. 2032-2105 and 2133 and the documents listed in Exs. 2148-2152 and 2161, or (2) the history of LORC and Chipperson Law Group, P.C. and its representation of Zaxcom before 2020. Ms. Golightly was not the custodian of Ex. 2032-2105 and 2133 or the documents listed in Exs. 2148-2152 and 2161, at least from 2005-2020, the period before Ms. Golightly joined Chipperson Law Group, P.C.

Petitioners further object to Exhibit 2147 as irrelevant under FRE 401, 402, and 403 because Ms. Golightly lacks personal knowledge as to (1) Exs. 2032-2105 and 2133, (2) the documents listed in Exs. 2148-2152 and Ex. 2161, or (3) the history of LORC and Chipperson Law Group, P.C, and its representation of Zaxcom before 2020, and thus her testimony is not relevant to any issue in the case.

EXHIBIT 2148 (File Explorer Screenshot #1)

Petitioners object to Exhibit 2148 as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that the documents listed within it, which Ms. Golightly alleges are Ex. 2070-2099, existed before the priority date of the '443 Patent. For example, since Ms. Golightly lacks any personal knowledge on Ex. 2070-2099 under FRE 602, her testimony can neither authenticate nor establish the date of those documents.

Petitioners further object to Exhibit 2148 and any dates, file names, or factual assertions therein as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

EXHIBIT 2149 (File Explorer Screenshot #2)

Petitioners object to Exhibit 2149 as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that the documents listed within it, which Ms. Golightly alleges are Ex. 2064-2068, existed before the priority date of the '443 Patent. For example, since Ms. Golightly lacks any personal knowledge on Ex. 2064-2068 under FRE 602, her testimony can neither authenticate nor establish the date of those documents.

Petitioners further object to Exhibit 2149 and any dates, file names, or factual assertions therein as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Exhibit 2150 (File Explorer Screenshot #3)

Petitioners object to Exhibit 2150 as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that the documents listed within it, which Ms. Golightly alleges are Ex. 2100-2104, existed before the priority date of the '443 Patent. For example, since Ms. Golightly lacks any personal knowledge on Ex. 2100-2104 under FRE 602, her testimony can neither authenticate nor establish the date of those documents.

Petitioners further object to Exhibit 2150 and any dates, file names, or factual assertions therein as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Exhibit 2151 (File Explorer Screenshot #4)

Petitioners object to Exhibit 2151 as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that the documents listed within it, which Ms. Golightly alleges are Ex. 2032, 2037-2040, 2045-2046, 2051, 2061, and 2069, existed before the priority date of the '443 Patent. For example, since Ms. Golightly lacks any personal knowledge on Ex. 2032, 2037-2040, 2045-2046,

2051, 2061, and 2069 under FRE 602, her testimony can neither authenticate nor establish the date of those documents.

Petitioners further object to Exhibit 2151 and any dates, file names, or factual assertions therein as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

EXHIBIT 2152 (File Explorer Screenshot #5)

Petitioners object to Exhibit 2152 as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that the documents listed within it, which Ms. Golightly alleges are Ex. 2033-2036, 2041-2050, 2052-2060, and 2062-2063, existed before the priority date of the '443 Patent. For example, since Ms. Golightly lacks any personal knowledge on Ex. 2033-2036, 2041-2050, 2052-2060, and 2062-2063 under FRE 602, her testimony can neither authenticate nor establish the date of those documents.

Petitioners further object to Exhibit 2152 and any dates, file names, or factual assertions therein as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

EXHIBIT 2156 (Document entitled “A versatile digital video engine for safeguards and security applications”)

Petitioners object to Exhibit 2156 as incomplete under FRE 106.

Petitioners further object to Exhibit 2156 as unauthenticated under FRE 901 and 902. Additionally, because Exhibit 2156 is unauthenticated under FRE 901 and 902, it is therefore irrelevant under FRE 401, 402, and 403 to any issue in this case because it fails to establish the date of Ex. 2118.

Petitioners further object to Exhibit 2156 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

EXHIBIT 2159 (Document entitled “NAB Holds Annual Convention”)

Petitioners object to Exhibit 2159 as unauthenticated under FRE 901 and 902.

Petitioners further object to Exhibit 2159 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Additionally, because Exhibit 2159 is inadmissible under FRE 901, 902, 801, and 802, Petitioners further object to Exhibit 2159 as irrelevant under FRE 401, 402, and 403 because it can neither authenticate nor establish the date of Ex. 2109.

EXHIBIT 2161 (File Explorer Screenshot #6)

Petitioners object to Exhibit 2161 as irrelevant under FRE 401, 402, and 403 because there is no admissible evidence that the document listed within it, which Ms. Golightly alleges is Ex. 2105, existed before the priority date of the '443

Patent. For example, since Ms. Golightly lacks any personal knowledge on Ex. 2105 under FRE 602, her testimony can neither authenticate nor establish the date of that document.

Petitioners further object to Exhibit 2161 and any dates, file names, or factual assertions therein as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Dated: October 6, 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 Patent
Owner's Supplemental Evidence upon:

ZAXCOM INC., c/o:

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Morgan Golightly - mdg@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: October 6, 2025

By: /Michael A. Fisher/

Case IPR2025-00230

Patent 7,711,443

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