

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

U.S. Patent No. 7,711,443

RESPONSE TO PATENT OWNER'S MOTION TO EXCLUDE

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GLOSSARY OF TERMS

Term	Definition
“Board”	USPTO Patent Trial and Appeal Board
“CTPG”	Consolidated Trial Practice Guide
“FRE”	Federal Rules of Evidence
“FWD”	Final Written Decision
“IPR”	Inter Partes Review
“Petition”	Petitioners’ Petition, IPR2025-00230, Paper 1 (PTAB Dec. 4, 2024)
“Petitioners”	RØDE Microphones, LLC and Freedman Electronics Pty Ltd.
“PO”, “Patent Owner”, or “Zaxcom”	Patent Owner, Zaxcom, Inc.
“POR” or “Response”	Patent Owner’s Response, IPR2025-00230, Paper 23 (PTAB Sep. 8, 2025)
“POSA”	Person of Ordinary Skill in the Art at the Time of the Invention
“Reply” or “Petitioners’ Reply”	Petitioners’ Reply, IPR2025-00230, Paper 43 (PTAB Dec. 1, 2025)
“Supplemental Expert Declaration”	Mr. Kyriakakis’ Declaration, IPR2025-00230, Exhibit 1073 (PTAB Dec. 1, 2025)

Pursuant to 37 C.F.R. § 42.23 and the Consolidated Trial Practice Guide (“CTPG”), Petitioners respond as follows to the Patent Owner’s Motion to Exclude (Paper 64) (“Mot.”). PO’s Motion quibbles about the weight of dozens of pieces of evidence. In such circumstances, the PTAB has noted that “the better course is to have a complete record of the evidence to facilitate public access as well as appellate review.” *Gnosis S.P.A. v. S. Ala. Med. Sci. Found.*, IPR2013-00116, Paper 68 at 43-44 (PTAB June 20, 2014). Importantly, “[s]imilar to a district court in a bench trial, the Board, sitting as a non-jury tribunal with administrative expertise, is well-positioned to determine and assign appropriate weight to evidence presented.” *Id.* at 43 (citing *Donnelly Garment Co. v. NLRB*, 123 F.2d 215, 224 (8th Cir. 1941) (“One who is capable of ruling accurately upon the admissibility of evidence is equally capable of sifting it accurately after it has been received....”)). None of PO’s arguments merit exclusion, particularly in view of these principles.

I. Federal Rule of Evidence 106 (Exs. 1058-1060)

Petitioners cite Ex. 1058 for the Merriam-Webster’s Collegiate Dictionary’s definition of “pack”—a word in a disputed claim term. See Paper 43 at 15; Ex. 1073 at ¶¶ 32-33. All four definitions of “pack” are provided in the exhibit, along with the cover, title, and copyright page of the dictionary. Moreover, even were Ex. 1058 incomplete, the remedy would not be exclusion. Instead, FRE 106 simply permits PO to introduce “any other part...that in fairness ought to be considered at the same time.” PO also alleges that defining “pack” in isolation is misleading, but that goes to weight, not admissibility. “A motion to exclude is not a vehicle for addressing the weight to be given evidence—arguments regarding weight should appear only in the merits documents.” CTPG at 79.

Exs. 1059-1060 are complete Sweetwater webpages, one with background on Sweetwater and another with a glossary definition of “body pack”—a disputed claim term. *See* Paper 43 at 16; Ex. 1073 at ¶ 42. Again, even if incomplete, the remedy would not be exclusion. FRE 106. PO also complains that the glossary is consumer-oriented rather than technical, but that does not make it incomplete. Further, PO’s complaint goes to the merits, not admissibility.

II. Federal Rules of Evidence 401-403 (Exs. 1039-1073)

PO asserts generally that Exs. 1039-1057, 1061, and 1067-1069 are cited “only for generalized background propositions or generic technical concepts that do not materially advance any asserted ground of unpatentability.” Mot. at 2. As an initial matter, Petitioners are permitted to introduce background evidence that pertains to its unpatentability grounds and the PTAB can give such evidence appropriate weight. *Koninklijke Philips N.V. v. Google LLC*, 948 F.3d 1330, 1337 (Fed. Cir. 2020) (the background knowledge of a POSA is relevant to an obviousness analysis, including in IPR); *see also Satco Prods., Inc. v. The Regents of the Univ. of Cal.*, IPR2021-00662, Paper 57 at 21 (PTAB Nov. 4, 2022) (finding reliance on a background reference in reply to be proper because “[a]rt can legitimately serve to document the knowledge that skilled artisans would bring to bear in reading the prior art identified as producing obviousness.” (quoting *Ariosa Diagnostics v. Verinata Health, Inc.*, 805 F.3d 1359, 1367 (Fed. Cir. 2015))). But more importantly, this generalized assertion against over 20 exhibits fails to explain with any particularity PO’s objections to these exhibits and thus cannot support exclusion under FRE 401-403.

For example, contrary to PO’s assertion that none of these exhibits are “relied upon to...supply any missing disclosure in the asserted prior art,” Mot. at 2, Petitioners use Ex. 1039 to rebut PO’s argument that Woo does not disclose element 1[A] of the ’443 Patent. *See* Paper

43 at 8-11, Ex. 1073 at ¶¶ 73-74. As Petitioners’ expert opines, Woo’s reference to a “jam sync process” discloses this element and Ex. 1039 supports that conclusion by reflecting the ordinary meaning of “jam sync” to a POSA. Ex. 1073 at ¶¶ 74-75; *see also* Paper 43 at 10. Evidence confirming a POSA’s understanding of Woo’s “jam sync process” as it pertains to a disputed claim element is unquestionably relevant.

PO alleges that Ex. 1053 is new evidence improperly introduced in reply. Mot. at 2-3. That argument contradicts the CTPG, which states that motions to exclude should not “address arguments or evidence that a party believes exceeds the proper scope of reply or sur-reply.” CTPG at 79. In any event, Ex. 1053 (a related patent) was properly submitted as rebuttal evidence to refute the proposed construction of PO’s expert. *See* Ex. 1073 at ¶ 39 (explaining how similar claim language in the related patent expressly permits the bodypack to comprise a receiver rather than a transmitter, which is directly contrary to PO’s expert’s construction). PO also complains that Ex. 1053 appears only in an expert declaration, but that does not make it irrelevant. *See Grp. III Int’l, Inc. v. Targus Int’l LLC*, IPR2021-00371, Paper 43 at 3-4 (PTAB Oct. 21, 2021).

PO’s remaining exhibit-specific arguments fare no better. PO argues that Ex. 1039 should be excluded under Rule 403 because it has “minimal probative value.” Mot. at 3. Even were PO correct, PO makes no attempt to argue that such probative value is “substantially outweighed” by any danger enumerated by FRE 403, instead merely asserting that the exhibit “risks misleading the record.” *Id.* This is not a basis for exclusion. PO also alleges that Petitioners allegedly failed to “establish[.]...that Ex-1039 reflects the understanding of a POSA or that a POSA would rely on [it].” *Id.* But that goes to weight, not admissibility. CTPG at 79. Moreover, Ex. 1039 is a patent that addresses jam syncing in detail and Petitioners’ expert relies

on it to corroborate his own opinion as to what the term “jam sync” means to a POSA, which indicates that Ex. 1073 does reflect the understanding of a POSA and would rely on it. Ex. 1073 at ¶ 74.

PO argues that Ex. 1058 should be excluded as irrelevant because it is a dictionary excerpt for “pack” but not “body” or “body pack.” Mot. at 3. PO fails to explain how the definition of “pack” is irrelevant to construing the term “body pack.” Instead, PO’s argument again goes to weight, not admissibility. See CTPG at 79. Regarding uncited pages 4, 5, and 7-10, see Mot. at 3, those were included inadvertently and are harmless. The proper remedy, if any, is to ignore or exclude just those pages, not the whole exhibit.

PO argues that Exs. 1059-1060 are irrelevant and unreliable because they are insufficiently technical. Mot. at 3-4. That is a merits-based argument that goes to the weight of the evidence, not its admissibility. As Petitioners’ expert explains, Sweetwater has been a retailer of professional audio and musical equipment since 1979. Ex. 1073 at ¶ 42. Sweetwater’s description of what “body pack” means “[i]n the world of wireless performance” is relevant to the construction of body pack here.

PO argues that Ex. 1062 (resubmitted as Ex. 1092) is irrelevant because it is from a different IPR involving a different patent (U.S. Patent No. 7,929,902). Mot. at 4. But that patent is also PO’s, is a continuation-in-part of and from the same field as the ’443 Patent, and Petitioners rely on the exhibit for the point that the PTAB already rejected PO’s arguments that Woo is not analogous art. Ex. 1073 at ¶ 120. Thus, is it probative in the present case.

PO argues that Ex. 1063 (resubmitted as Ex. 1093)—PO’s own press release—is irrelevant because it consists of “marketing and promotional statements.” Mot. at 5. That goes to weight, not admissibility.

PO seeks to exclude Ex. 1064—a Texas Instruments user guide. *Id.* The guide is relevant to, *e.g.*, the availability, suitability, and maturity of microcontrollers in the relevant time period—and thus the enablement of Strub—as it covers a product expressly mentioned for use in an embodiment of the ’443 Patent (TMS320C5509A). Ex. 1073 at ¶ 156; Paper 43 at 25; *see also* ’443 Patent at 6:23-25.

Relatedly, PO seeks to exclude Ex. 1065—a press release concerning the same Texas Instruments product mentioned in the ’443 Patent and described in Ex. 1064—because it is promotional and marketing material. Mot. at 5-6. But Petitioners rely on it because it provides temporal context regarding the availability of the product, the relevance of which PO does not dispute. Ex. 1073 at ¶ 164; Paper 43 at 25. PO’s arguments otherwise go to weight.

PO seeks to exclude Ex. 1070 (resubmitted as Ex. 1089)—a Sony TCD-D7 Walkman manual. Mot. at 6. The exhibit is relevant to Petitioners’ expert’s opinion that the technology of the challenged claims was neither complex nor unpredictable, to rebut PO’s expert’s opinion that Strub is non-enabling. Ex. 1073 at ¶¶ 152-153; Paper 43 at 25. It was PO’s burden to contest enablement and, after doing so in its POPR, Petitioners were entitled to submit rebuttal evidence to show enablement. PO also asserts there is no proof the document was publicly accessible prior to December 2025, notwithstanding the 1993 copyright date and PO’s admission that it is “operating instructions for a consumer product.” Ex. 1070 at 1; Mot. at 6.

PO seeks to exclude Exs. 1071 and 1072 (resubmitted as Exs. 1090 and 1091)—Conexant product materials from the early 2000s. Mot. at 7. PO asserts that Ex. 1071 is irrelevant because it is cited only for background and that neither exhibit is relied upon in Petitioners’ Reply. But Petitioners and their expert rely on both as evidence of what was well-known in the start of the art, in connection with whether Strub enables the challenged claims.

Paper 43 at 25; Ex. 1073 at ¶¶ 150-155. Again, Petitioners were entitled to submit such rebuttal evidence after PO challenged enablement in its POPR. PO also contends that there is no proof as to the date of the documents, but Ex. 1071 has a 2002 copyright date and Ex. 1072 has a 2000 copyright date. Ex. 1071 at 4; Ex. 1072 at 11.

PO argues that “[s]ignificant portions” of Ex. 1073 are irrelevant because they are outside the proper scope of reply, but fails to provide any specific explanation. Mot. at 7-8. In any event, PO improperly raises an issue of scope, not admissibility. CTPG at 79 (motions to exclude should not “address arguments or evidence that a party believes exceed the proper scope of reply or sur-reply.”).

Finally, PO argues that all of Exs. 1039-1073 should be excluded under FRE 403 because they “generally exist to amend holes in Petitioners’ arguments.” Mot. at 8. This also is an impermissible argument about scope, not admissibility. CTPG at 79.

III. Federal Rules of Evidence 702, 703, and 705 (Ex. 1073)

In three generic sentences, PO argues that Ex. 1073 should be excluded under FRE 702, 703, and 705 for being unreliable and failing to disclose the basis of the opinions therein. PO’s mini-*Daubert* identifies no specific deficiencies and cannot serve as the basis for exclusion. Ex. 1073 is a thorough, 129-page declaration from Mr. Kyriakakis, with a detailed unpatentability analysis supported by evidence.

PO also asserts that Ex. 1073 is inadmissible because Petitioners’ expert relies on “unidentified and undisclosed materials....” Mot. at 9. PO points only to a reservation of rights that Mr. Kyriakakis “*may* also consider additional documents and information...that may not yet have been provided....” See *id.* (quoting Ex. 1073 at ¶ 2). PO’s attempt to spin this as a

statement that Mr. Kyriakakis's proffered opinions are somehow based on information he did not yet have is meritless.

IV. Federal Rules of Evidence 801-802 (Exs. 1039-1041, 1043-1047, 1049-1057, 1059-1061, 1063, 1065, 1067-1069, and 1073)

PO seeks to exclude over two dozen exhibits on hearsay grounds. All of these exhibits are relied upon by Petitioners' expert in forming his opinions and PO helpfully explains how each is relevant to the proceeding. *Id.* at 10-12. Crucially, PO ignores that an expert may rely on inadmissible facts or data in forming an opinion, and the facts or data need not be admissible for the opinions in Ex. 1073 to be admitted. FRE 703. In fact, even in a jury context where the risk of confusion or prejudice is high, such inadmissible facts or data may be disclosed to the jury. *Id.* Here, where the PTAB's administrative expertise greatly mitigates or even eliminates the risk of confusion or prejudice, the PTAB is well suited—and prefers—to admit everything and assign it appropriate weight. *Gnosis*, IPR2013-00116, Paper 68 at 43-44. With little to no risk of prejudice, any prejudicial effect is substantially outweighed by the probative value of these exhibits in helping the PTAB evaluate Mr. Kyriakakis' opinions (with appropriate weight being given to the exhibits themselves). FRE 703.

In any event, many of these documents fall under hearsay exceptions or are not hearsay. Certain of the documents fall under the ancient documents exception, FRE 803(16), because they are from before January 1, 1998. *See* Ex. 1039 (1985), 1040 (1990), 1041 (1994), 1043 (1995), 1056 (1997). Ex. 1053 is PO's own patent and Ex. 1063 (resubmitted as Ex. 1093) is PO's own press release, which are opposing party statements and thus not hearsay under FRE 801(d)(2).

Many of the remaining documents are decades-old patents and patent application publications that are not quite ancient documents but are relied on to corroborate Mr. Kyriakakis' opinions regarding the pertinent knowledge and understanding of a POSA in the field, a purpose

for which they exhibit sufficient guarantees of trustworthiness and are thus admissible under the residual exception, FRE 807. *See* Ex. 1044, 1045, 1046, 1047, 1049, 1050, 1051, 1052, 1054, 1055, 1057, 1061, 1067, 1068, 1069. Further, because these patents and patent application publications are being used as evidence of the knowledge and understanding of POSAs at the relevant time—whether or not such information was true—they are not being used for hearsay purposes. *See Mylan Pharms., Inc. v. Sanofi-Aventis Deutschland GmbH*, IPR2019-00122, Paper 83 at 61-62 (PTAB May 29, 2020) (holding that exhibits “offered to show how a person of ordinary skill in the art would have understood a claim term” were not hearsay “because they were offered to show the effect on the reader and/or the belief of the author, not for the truth of the matter asserted”); *Eli Lilly & Co. v. Teva Pharms. Int’l GmbH*, IPR2022-00796, Paper 45 at 102-104 (PTAB Oct. 11, 2023) (holding that various exhibits, including a patent and a press release, were not hearsay because they were offered “not for the truth of the matter asserted, but for the non-hearsay purpose of showing the effect of the reference on the hypothetical person of ordinary skill in the art”). The remaining documents are old industry publications that similarly exhibit sufficient guarantees of trustworthiness for the purposes for which they are used. *See* Ex. 1060 (a leading retailer’s website entry showing a January 2003 industry definition of “body pack,” with Ex. 1059 providing context about the retailer), 1065 (an industry press release from June 2004 identifying when the Texas Instruments product mentioned in the ’443 Patent was announced).

V. Federal Rules of Evidence 901-902 (Exs. 1065 and 1070-1072)

PO asserts that Petitioners have failed to authenticate Exs. 1065 and 1070-1072 (resubmitted as Exs. 1089-1091). Ex. 1065 is a press release from June 2004, which falls under FRE 901(b)(8). The press release is at least 20 years old, exhibits no suspicion about its

authenticity, and, as the exhibit reflects, appeared on Phys.org, a website that has been publishing science news for over two decades. See <https://sciencex.com/help/about-us/> (“Science X [of which Phys.org is one component] was founded in March 2004 by two Ph.D. students seeking to fill the void in hard science news designed for informed readers.”); *see also* FRE 901(b)(8). Further, the press release concerns the same Texas Instruments part number specifically mentioned in the ’443 Patent (TMS320C5509A)—in an application filed in 2005, contemporaneous with the press release—which provides further indicia of reliability. See ’443 Patent at 6:23-25.

Ex. 1070 also falls under FRE 901(b)(8). It has a copyright date of 1993 and, as PO admits, it consists of “operating instructions for a consumer product.” Mot. at 6. It is from Sony, a well-known consumer electronics manufacturer and exhibits no suspicion about its authenticity. It was available via a website archive, and it is common for public-facing consumer electronics manuals to be archived and available online. Further, the reliability of Ex. 1070 as to the availability of the subject exemplary DAT unit is corroborated by the knowledge of Mr. Kyriakakis of the history of DAT units. Ex. 1073 at ¶ 153.

Exs. 1071 and 1072 also fall under FRE 901(b)(8). Both are product documents from Conexant, which was a major developer of technology for voice and audio processing, and both documents include company contact information. Ex. 1071 has a copyright date of 2002 and Ex. 1072 has a copyright date of 2000. Ex. 1071 at 4; Ex. 1072 at 11. Neither document exhibits any suspicion about its authenticity. Both were available online, where public-facing company technical documents can commonly be found. Further, the reliability of Exs. 1071 and 1072 is corroborated by the knowledge of Mr. Kyriakakis regarding the history of RF technology. Ex. 1073 at ¶ 155.

In addition, Exs. 1065 and 1070-1072 are self-authenticating under FRE 902(7) based on the logos and other trade inscriptions that they bear. Ex. 1065 (“Phys.org” logo); Ex. 1070 (Sony, DAT, and Walkman logos; Sony copyright notice); Exs. 1071, 1072 (CONEXANT logo and inscription).

PO cites *Standard Innovation Corp. v. Lelo, Inc.*, IPR2014-00148, Paper 42 at 10 (PTAB Apr. 23, 2015). There, Petitioner relied exclusively on FRE 901(b)(4) to authenticate the documents, but failed to identify the supposedly distinct characteristics required under that provision. *Id.* Here, by contrast, all of the challenged exhibits are authentic under FRE 901(8) and/or 902(7).

VI. Federal Rules of Evidence 1006 (Ex. 1073)

PO argues that Ex. 1073 should be excluded in its entirety because it fails to satisfy the requirements of FRE 1006. PO fails to identify any specific portions of Ex. 1073 that violate the rule. PO similarly does not identify any allegedly “voluminous” materials that Mr. Kyriakakis supposedly summarized without making the underlying materials available for inspection. FRE 1006. PO’s generic objection and argument cannot serve as the basis for exclusion.

VII. 37 C.F.R. § 42.6(a)(3) (Exs 1062 and 1073)

PO argues that Exs. 1062 and 1073 should be excluded because they improperly incorporate arguments by reference. That is incorrect. As Petitioners and their expert explain, Ex. 1062 is cited for the point that “the PTAB has previously rejected Patent Owners’ arguments that Woo is not analogous art....” Ex. 1073 at ¶ 120 (citing Ex. 1062 at 30-31); *see also* Paper 43 at 14. That point is specifically identified in the context of responding to PO’s expert’s opinion that Woo is not in the same field. Ex. 1073 at ¶¶ 116-120.

Finally, PO seeks to exclude Ex. 1073 in its entirety with generalized allegations that Mr. Kyriakakis “improperly attempts to cure deficiencies in the Petition by introducing new citations, new evidentiary support, and new substantive arguments by reference that were not presented in the Petition or the Reply.” Mot. at 15. PO’s failure to identify with specificity any basis for exclusion is fatal to its argument. Moreover, this is an impermissible argument about scope, not admissibility. CTPG at 79.

Date: March 2, 2026

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CERTIFICATE OF SERVICE

The undersigned certifies that on March 2, 2026, a complete and entire copy of the foregoing “RESPONSE TO PATENT OWNER’S MOTION TO EXCLUDE” is being served on the Patent Owner at the electronic addresses shown below per consent:

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Patent Owner agreed to have the above-listed counsel accept electronic service in its December 23, 2004 Mandatory Notices. *See* 37 CFR § 42.105(b) (“Upon agreement of the parties, service may be made electronically....”).

Date: March 2, 2026

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