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.

IPR2025-00232

Patent 10,276,207

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 2031 (Document entitled "User's Manual TRX900AA Digital Transmitter")

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.

Exhibit 2032 (Document entitled "User's Manual TRX900LA & TRX900LAS Digital Recording Transmitter")

Petitioners object to Exhibit 2032 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

Exhibit 2033 (Webpage entitled "Lectrosonics Announces Firmware Updates For Select Transmitters To Record & Transmit Simultaneously For Markets Outside Of The United States")

Petitioners 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.

EXHIBIT 2034 (Webpage entitled "Sound Devices A10-TX-BU Digital Bodypack Transmitter – B – band")

Petitioners 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.

EXHIBIT 2035 (Document enititled "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 2035 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2036 (Declaration of Mr. William Sarokin)

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

Petitioners further object to Exhibit 2030 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 2037 (Declaration of Mr. Jeffrey S. Wexler)

Petitioners object to Exhibit 2037 as improper opinion testimony by a lay witness under FRE 701.

Petitioners further object to Exhibit 2030 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 2038 (Document entitled "Engineering Emmys")

Petitioners object to Exhibit 2038 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2039 (Engineering Emmy Awards Press Release)

Petitioners object to Exhibit 2039 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2040 (Engineering Emmy Awards Entry Form)

Petitioners object to Exhibit 2040 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2041 (Photograph of Emmy Award)

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

EXHIBIT 2042 (Photograph of Emmy Award)

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

EXHIBIT 2043 (Photograph of Emmy Award)

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

EXHIBIT 2044 (Photograph of Technical Achievement Award)

Petitioners object to Exhibit 2044 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2045 (Photograph of Technical Achievement Award)

Petitioners object to Exhibit 2045 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2046 (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 2046 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2047 (Document entitled "New Series DSR-500WS/500WSP DSR-300A/300AP")

Petitioners object to Exhibit 2047 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

Petitioners further object to Exhibit 2047 as unauthenticated under FRE 901 and 902.

EXHIBIT 2048 (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 2048 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2049 (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 2049 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2050 (Webpage entitled "PC17YC High Resolution Micro Video Camera")

Petitioners object to Exhibit 2050 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2051 (Document entitled "Seagate Barracuda 9LP Family Product Manual, Volume 1")

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.

EXHIBIT 2052 (Document entitled "Look YouTube, No Hands! Loxcie Introduces Wearable Camcorder")

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.

EXHIBIT 2053 (Document entitled "Panasonic Owner's Manual Wearable 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 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.

EXHIBIT 2056 (Document entitled "ION Twin Video Records the Scenery and You Enjoying the Scenery at the Same Time")

Petitioners object to Exhibit 2056 as inadmissible hearsay under FRE 801 and 802 that does not fall within any exception.

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

EXHIBIT 2060 (Document entitled "User Guide Camera 100")

Petitioners 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.

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.*, IPR2025-00232 (U.S. Patent 10,276,207)

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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