

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
Petitioner,

v.

X1 DISCOVERY, INC.,
Patent Owner.

IPR2025-00254
Patent 10,552,490

PETITIONER'S OBJECTION TO PATENT OWNER'S EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b), Microsoft Corporation (“Petitioner”) hereby submits the following objections to the evidence Patent Owner filed with its Response dated November 3, 2025 (Paper 21). Petitioner’s objections apply equally to Patent Owner’s reliance on this evidence in any subsequently filed documents in this proceeding.

Petitioner objects as follows to the admissibility of the following evidence.

Evidence	Objections
Exhibit 2020 (<i>Supplemental Declaration of Martin P. Haeberli</i>)	Improper expert testimony under FRE 702, 703, 704, and 901, and 37 C.F.R. § 42.65. This exhibit contains statements and opinions that do not rely on the kind of facts or data experts in the relevant field would reasonably rely upon. The exhibit fails to provide the underlying facts or data on which the opinion is based. Improper lay testimony under FRE 701, to the extent it offers testimony outside of his area of expertise or fails to disclose the underlying facts or data on which the opinion is based. Impermissible legal conclusions. To the extent Patent Owner relies on the contents of this document for the truth of the matter asserted, Petitioner objects to such contents as inadmissible hearsay under FRE 801 and 802 that does not fall under any exceptions, including those of FRE 803, 804, 805, or 807.

Evidence	Objections
	Petitioner further objects to this exhibit under FRE 401, 402, and 403.
Exhibit 2022 (<i>Dan Cosley et al., SuggestBot: Using Intelligent Task Routing to Help People Find Work in Wikipedia</i>)	Petitioner objects to this exhibit under FRE 401, 402, and 403.
Exhibit 2024 (<i>Windows XP Home Edition System Requirements</i>)	Petitioner objects to this exhibit under FRE 401, 402, and 403.

Respectfully submitted,

Dated: November 10, 2025

By: /Todd M. Siegel/

Todd M. Siegel, Reg. No. 73,232
todd.siegel@klarquist.com
KLARQUIST SPARKMAN, LLP
One World Trade Center, Suite 1600
121 S.W. Salmon Street
Portland, Oregon 97204
Tel: 503-595-5300
Fax: 503-595-5301

Counsel for Petitioner

CERTIFICATE OF SERVICE
IN COMPLIANCE WITH 37 C.F.R. § 42.6(e)(4)

The undersigned certifies that on November 10, 2025, a complete copy of
PETITIONER'S OBJECTION TO PATENT OWNER'S EVIDENCE was
served on counsel for the Patent Owner via electronic mail as follows:

Lori Gordon
GOODWIN PROCTER LLP
1900 N St. N.W.
Washington, D.C. 20036
Email: Gordon-ptab@goodwinlaw.com
DG-X1-IPR@goodwinlaw.com

Sanjeet K. Dutta
GOODWIN PROCTER LLP
601 Marshall St.
Redwood City, CA 94063
Email: sdutta@goodwinlaw.com

Christie L. Larochelle
GOODWIN PROCTER LLP
100 Northern Avenue
Boston, MA 02210
Email: clarochelle@goodwinlaw.com

By: /Todd M. Siegel/
Todd M. Siegel, Reg. No. 73,232
todd.siegel@klarquist.com
KLARQUIST SPARKMAN, LLP
One World Trade Center, Suite 1600
121 S.W. Salmon Street
Portland, Oregon 97204
Tel: 503-595-5300
Fax: 503-595-5301

Counsel for Petitioner