

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TWITCH INTERACTIVE, INC.,
Petitioner,

v.

RAZDOG HOLDINGS LLC,
Patent Owner

Case No. IPR2025-00307

U.S. Patent No. 9,729,658

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Patent Owner hereby submits objections to Petitioner's evidence submitted during the preliminary proceeding within ten business days of institution of trial pursuant to 37 C.F.R. § 42.64(b)(1). The discussion below identifies the evidence Patent Owner objects to and identifies the grounds for the objection with particularity, including the Federal Rules of Evidence ("FRE") or other rules that form the basis for the objections.

1. Ex. 1002 – Declaration Of Paul D. Martin, Ph.D. In Support of Petitions For Inter Partes Review of U.S. Patent Nos. 9,729,658 And 10,334,068

Patent Owner objects to paragraphs 89, 96, 97, 98, 99, 102, 103, 104, 105, 106, 107, 108, 109, 111, 208, 209, 228, 453, and 454 of Exhibit 1002 under FRE 703 as these paragraphs rely on Exhibits 1016-1018, 1020-1023, 1025-1047, and 1048-1050, which Patent Owner objects to as inadmissible evidence.

2. Ex. 1016 – Amazon EC2 Beta, AMAZON WEB SERVICES BLOG (Aug. 29, 2006)

Patent Owner objects to Exhibit 1016 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1016 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1016 purports to be an "archived copy" of a website, but Petitioner fails to offer an effective declaration or other foundational evidence or facts relating to Ex. 1016 or the purported website necessary to authenticate the Exhibit. *See* Fed. R. Evid. 901; IPR2013-00578 *Neste Oil Oyj v. REG Synthetic Fuels, LLC*

(Paper 53, March 12, 2015) (“Neste has not provided the testimony of any witness with personal knowledge of the websites depicted in the printouts; nor do we have any other basis for concluding that the contents of the website are authentic. For this reason, [the challenged Wayback Machine exhibits] lack authentication and are inadmissible.”). Ex. 1016 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

3. Ex. 1017 – About Microsoft, <https://news.microsoft.com/about/>

Patent Owner objects to Exhibit 1017 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1017 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1017 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

4. Ex. 1018 – Reflecting on our ten year App Engine journey, GOOGLE CLOUD BLOG

Patent Owner objects to Exhibit 1018 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1018 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1018 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document, nor at any time during the alleged “ten year” journey the document claims to summarize.

5. Ex. 1020 – The Benefits of Cloud Computing (IBM Dynamic Infrastructure, July 2009)

Patent Owner objects to Exhibit 1020 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1020 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. 1020 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

6. Ex. 1021 – Cloud Computing and Sustainability (Accenture Whitepaper, November 2010)

Patent Owner objects to Exhibit 1021 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1021 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1021 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

7. Ex. 1022 – RDF Site Summary (RSS) 1.0 (Oct. 11, 2010)

Patent Owner objects to Exhibit 1022 as it has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1022 purports to be an “archived copy” of a website, but Petitioner fails to offer an effective declaration or other foundational evidence or facts relating to Ex. 1022 or the purported website necessary to authenticate the Exhibit. *See* Fed. R. Evid. 901; IPR2013-00578 *Neste Oil Oyj v. REG Synthetic Fuels, LLC* (Paper 53, March 12, 2015) (“Neste has not provided the testimony of any witness with personal knowledge of the websites depicted in the printouts; nor do we have any other basis for concluding that the contents of the website are authentic. For this reason, [the challenged Wayback Machine exhibits] lack authentication and are inadmissible.”). Ex. 1022 is also not

relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

8. Ex. 1023 – W3C RSS 1.0 News Feed Creation How-To (May 28, 2010)

Patent Owner objects to Exhibit 1023 as it has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1023 purports to be an “archived copy” of a website, but Petitioner fails to offer an effective declaration or other foundational evidence or facts relating to Ex. 1023 or the purported website necessary to authenticate the Exhibit. *See* Fed. R. Evid. 901; IPR2013-00578 *Neste Oil Oyj v. REG Synthetic Fuels, LLC* (Paper 53, March 12, 2015) (“Neste has not provided the testimony of any witness with personal knowledge of the websites depicted in the printouts; nor do we have any other basis for concluding that the contents of the website are authentic. For this reason, [the challenged Wayback Machine exhibits] lack authentication and are inadmissible.”). Ex. 1023 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R.

Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

9. Exs. 1025-1038

Patent Owner objects to each of Exhibits 1025-1038 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Exs. 1025-1028 have not been authenticated and are not self-authenticating. *See* Fed. R. Evid. 901-902. These exhibits purport to be “archived copies” of websites, but Petitioner fails to offer an effective declaration or other foundational evidence or facts relating to the exhibits or the purported websites necessary to authenticate the Exhibits. *See* Fed. R. Evid. 901; IPR2013-00578 *Neste Oil Oyj v. REG Synthetic Fuels, LLC* (Paper 53, March 12, 2015) (“Neste has not provided the testimony of any witness with personal knowledge of the websites depicted in the printouts; nor do we have any other basis for concluding that the contents of the website are authentic. For this reason, [the challenged Wayback Machine exhibits] lack authentication and are inadmissible.”). Exs. 1025-1038 are also not relevant under Fed. R. Evid. 401, and even if they were, their admission would be unfairly prejudicial (e.g., they would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of these documents.

10. Ex. 1039 - Best Practices for XML sitemaps and RSS/Atom feeds, Google Search Central Blog

Patent Owner objects to Exhibit 1039 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1039 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1039 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

11. Ex. 1040 - Awesome RSS, GitHub

Patent Owner objects to Exhibit 1040 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1040 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902.

12. Ex. 1041 – Kyle Nazario, How to Follow RSS Feeds in Chrome, Safari and Firefox, TechNorms.com (Jul. 17, 2015)

Patent Owner objects to Exhibit 1041 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1041 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1041 purports to be an “archived copy” of a website, but Petitioner fails to offer an effective declaration or other foundational evidence or facts

relating to Ex. 1041 or the purported website necessary to authenticate the Exhibit. *See* Fed. R. Evid. 901; IPR2013-00578 *Neste Oil Oyj v. REG Synthetic Fuels, LLC* (Paper 53, March 12, 2015) (“Neste has not provided the testimony of any witness with personal knowledge of the websites depicted in the printouts; nor do we have any other basis for concluding that the contents of the website are authentic. For this reason, [the challenged Wayback Machine exhibits] lack authentication and are inadmissible.”). Ex. 1041 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

13. Ex. 1042 - Sergey Tkachenko, Google re-adds RSS support to the Chrome browser, Winaero

Patent Owner objects to Exhibit 1041 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1041 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902.

14. Ex. 1043 - Chris Wetherell, Google Reader Two Weeks, Google Reader Blog (Dec. 15, 2005)

Patent Owner objects to Exhibit 1043 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex.

1043 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1043 purports to be an “archived copy” of a website, but Petitioner fails to offer an effective declaration or other foundational evidence or facts relating to Ex. 1043 or the purported website necessary to authenticate the Exhibit. *See* Fed. R. Evid. 901; IPR2013-00578 *Neste Oil Oyj v. REG Synthetic Fuels, LLC* (Paper 53, March 12, 2015) (“Neste has not provided the testimony of any witness with personal knowledge of the websites depicted in the printouts; nor do we have any other basis for concluding that the contents of the website are authentic. For this reason, [the challenged Wayback Machine exhibits] lack authentication and are inadmissible.”). Ex. 1043 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

15. Ex. 1044 – Andy Wibbels, How to Use Google Reader (Oct. 24, 2005)

Patent Owner objects to Exhibit 1044 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1044 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1044 purports to be an “archived copy” of a website, but Petitioner fails to offer an effective declaration or other foundational evidence or facts

relating to Ex. 1044 or the purported website necessary to authenticate the Exhibit. *See* Fed. R. Evid. 901; IPR2013-00578 *Neste Oil Oyj v. REG Synthetic Fuels, LLC* (Paper 53, March 12, 2015) (“Neste has not provided the testimony of any witness with personal knowledge of the websites depicted in the printouts; nor do we have any other basis for concluding that the contents of the website are authentic. For this reason, [the challenged Wayback Machine exhibits] lack authentication and are inadmissible.”). Ex. 1044 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

16. Ex. 1045 – Andrew Hitchcock Blog (Oct. 25, 2005)

Patent Owner objects to Exhibit 1045 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1045 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1045 purports to be an “archived copy” of a website, but Petitioner fails to offer an effective declaration or other foundational evidence or facts relating to Ex. 1045 or the purported website necessary to authenticate the Exhibit. *See* Fed. R. Evid. 901; IPR2013-00578 *Neste Oil Oyj v. REG Synthetic Fuels, LLC* (Paper 53, March 12, 2015) (“Neste has not provided the testimony of any witness

with personal knowledge of the websites depicted in the printouts; nor do we have any other basis for concluding that the contents of the website are authentic. For this reason, [the challenged Wayback Machine exhibits] lack authentication and are inadmissible.”). Ex. 1045 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

17. Ex. 1046 – Analytics, Cambridge Dictionary

Patent owner objects to Exhibit 1046 as it has not been authenticated and is not self-authenticating. *See* Fed R. Evid. 901-902. Ex. 1046 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this definition has not been shown to have been known by a POSITA around the time of the invention.

18. Ex. 1047 – Analytics, Lexico powered by Oxford English Dictionary (Aug. 10, 2020)

Patent Owner objects to Exhibit 1046 as it has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1046 purports to be an “archived copy” of a website, but Petitioner fails to offer an effective declaration or

other foundational evidence or facts relating to Ex. 1046 or the purported website necessary to authenticate the Exhibit. *See* Fed. R. Evid. 901; IPR2013-00578 *Neste Oil Oyj v. REG Synthetic Fuels, LLC* (Paper 53, March 12, 2015) (“Neste has not provided the testimony of any witness with personal knowledge of the websites depicted in the printouts; nor do we have any other basis for concluding that the contents of the website are authentic. For this reason, [the challenged Wayback Machine exhibits] lack authentication and are inadmissible.”). Ex. 1047 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

19. Ex. 1048 – Shelly Powers, Practice RDF (2003)

Patent Owner objects to Exhibit 1048 as hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Ex. 1045 has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1048 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative

evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported 2003 date of this item.

20. Ex. 1049 - WebTV, <https://webtv.zone/>

Patent Owner objects to Exhibit 1049 as it has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1049 is also hearsay offered for a hearsay purpose and to which no valid exception applies. *See* Fed. R. Evid. 801-807. Moreover, Ex. 1049 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this site was not available around the time of the invention as Petitioner's own evidence indicates this is a fictional site: "WebTV Redialed allows you to surf the Internet and interact with all different types of entertainment, the fun way; on your TV! The service acts as a replacement for the original WebTV service, which was discontinued in 2013."

21. Ex. 1050 - Instructions for using Web TV, ChicagoNet (Jun. 21, 2010)

Patent Owner objects to Exhibit 1050 as it has not been authenticated and is not self-authenticating. *See* Fed. R. Evid. 901-902. Ex. 1050 purports to be an "archived copy" of a website, but Petitioner fails to offer an effective declaration or other foundational evidence or facts relating to Ex. 1050 or the purported website necessary to authenticate the Exhibit. *See* Fed. R. Evid. 901; IPR2013-00578 *Neste*

Oil Oyj v. REG Synthetic Fuels, LLC (Paper 53, March 12, 2015) (“Neste has not provided the testimony of any witness with personal knowledge of the websites depicted in the printouts; nor do we have any other basis for concluding that the contents of the website are authentic. For this reason, [the challenged Wayback Machine exhibits] lack authentication and are inadmissible.”). Ex. 1050 is also not relevant under Fed. R. Evid. 401, and even if it was, its admission would be unfairly prejudicial (e.g., it would confuse the issues, be misleading, result in undue delay, waste time, or needlessly present cumulative evidence) under Fed. R. Evid. 403 in that this information has not been shown to have existed on the purported date of this document.

Respectfully Submitted,

Dated: August 11, 2025

By: /s/ Roger Thompson
Roger Thompson
Reg. No. 29,594

Attorney for Patent Owner
RazDog Holdings LLC

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing **PATENT OWNER'S
OBJECTIONS TO EVIDENCE** were served on the date below via email at the following email addresses:

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Dated: August 11, 2025

By: /s/Roger Thompson
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