

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
Petitioner,

v.

PARTEC CLUSTER COMPETENCE CENTER GMBH,
Patent Owner.

IPR2025-00318
Patent No. 11,537,442

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 Preliminary Response dated April 16, 2025 (Paper 7). 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 submitted prior to institution.

Evidence	Objections
Exhibit 2009 (Declaration of Dr. David Kaeli)	Lack of relevance, confusion of the issues, and unfair prejudice under FRE 401-403: Each paragraph in Exhibit 2009 lacks relevance, confuses the issues, and risks unfair prejudice to the extent not cited in support of an argument made in the patent owner response in this proceeding.
Exhibit 2012 (<i>The DEEP-ER Project: I/O and Resiliency Extensions for the Cluster-Booster Architecture</i>)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2013 (<i>NVIDIA GeForce RTX 2080 Ti Specs</i>)	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.

Exhibit 2014 <i>(Efficient Data-parallel Distributed DNN Training for Big Dataset Under Heterogeneous GPU Cluster)</i>	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.
Exhibit 2015 <i>(Practice and Experience in Using Parallel and Scalable Machine Learning with Heterogenous Modular Supercomputing Architectures)</i>	Lack of authentication under FRE 901: The exhibit is not authenticated. Hearsay under FRE 801-807: The exhibit constitutes inadmissible hearsay.

Respectfully submitted,

Dated: July 22, 2025

By: /Frank Morton-Park/

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

The undersigned certifies that on July 22, 2025, a complete copy of the
PETITIONER’S OBJECTION TO PATENT OWNER’S EVIDENCE was
served on counsel for the Patent Owner via electronic mail as follows:

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