

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADB SAFEGATE SWEDEN AB,
ADB SAFEGATE BV, and
ADB SAFEGATE AMERICAS, LLC
Petitioner,

v.

HONEYWELL INTERNATIONAL INC.,
Patent Owner.

PGR2023-00053
Patent 11,538,349 B2

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Honeywell International Inc. ("Honeywell") objects to the following exhibits filed by Petitioners as follows:

Exhibit	Objections
1003	Patent Owner objects to Exhibit 1003 (expert declaration of Dr. Mark Campbell) to the extent that it incorporates inadmissible exhibits to which Patent Owner objects herein. For example, Petitioner has not established the relevancy, authenticity, publication dates, or reliability of many of the Exhibits relied upon in the declaration. Fed. R. Evid. 402/403. The declaration includes many statements not relevant to any ground upon which the trial was instituted. (<i>See, e.g.</i>, ¶¶ 40-67). Fed. R. Evid. 402/702/703. Dr. Campbell, the witness offering declaration testimony (a) lacks the knowledge, skill, experience, training, or education to testify as an expert in a manner that is helpful to the Board; (b) provides opinions that are not based on sufficient facts or data; (c) has not applied reliable principles and methods; and (d) has not reliably applied such principles and methods to the facts of the case. (<i>See, e.g.</i>, ¶¶ 14, 74-105, 135, 158). 37 C.F.R. § 42.65(a): Dr. Campbell fails to identify with particularity the underlying facts or data on which his opinions are based. (<i>See, e.g.</i>, ¶¶ 74-192).
1007	Fed. R. Evid. 402/403. This exhibit is not relevant to any ground upon which this trial was instituted. Fed. R. Evid. 901. Petitioner has not properly authenticated or identified this document, and has not established the publication date.
1008	Fed. R. Evid. 402/403. This exhibit is not relevant to any ground upon which this trial was instituted.

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1009	Fed. R. Evid. 402/403. This exhibit is not relevant to any ground upon which this trial was instituted. For example, the Petition does not cite this exhibit. Fed. R. Evid. 901. Petitioner has not properly authenticated or identified this document, and has not established the publication date.
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1031	Fed. R. Evid. 402/403. This exhibit is not relevant to any ground upon which this trial was instituted. Fed. R. Evid. 901. Petitioner has not properly authenticated or identified this document, and has not established the publication date.

Respectfully submitted,

Dated: March 21, 2024

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2024, I caused a true and correct copy of the foregoing materials:

- Patent Owner's Objections To Evidence

to be served via electronic mail on the following counsel of record for Petitioners:

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