UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SIMPSON STRONG-TIE COMPANY INC.
Petitioner

v.

COLUMBIA INSURANCE COMPANY
Patent Owner

_____

Case PGR2024-00050
Patent No. 11,920,339

PATENT OWNER'S OBJECTIONS TO EVIDENCE SERVED BY PETITIONER IN POST GRANT REVIEW

Pursuant to 37 C.F.R. § 42.64(b), Patent Owner Columbia Insurance Company ("Columbia") objects as follows to the admissibility of evidence served with the Petition and Preliminary Reply filed by Petitioner Simpson Strong-Tie Company Inc.:

Evidence	Objections
Ex. 1003 - Declaration of W. Andrew Fennell in Support of Petition for Post-Grant Review of U.S. Patent No. 11,920,339	37 C.F.R. 42.6(a)(3): Paragraphs 96, 99-112, 122-131, 136-139, 147-156, 160-163, 167-170, 173, 241-243, 248, 252-261, 266, 274, 279, 306, 331-338, 342-350, 354, 355, 364, 437-440, 442, 446, 447, 450-454, 456-458, 460, 473-476, 487, and 496-504 from W. Andrew Fennell's Declaration are improperly incorporated by reference in the Petition. Petitioner's attempt to incorporate by reference these paragraphs into the Petition exceeds the permissible word count limit.
Ex. 1007 - Japanese Design Patent No. D1213894 to Yamaguchi (Yamaguchi)	**FRE 901**: Petitioner has not produced evidence sufficient to support a finding

Evidence	Objections
with attached certified English-language translation	that this item is what Petitioner claims it is.
Ex. 1010 - U.S. Patent App. Pub. No., 2011/0047806 to Harrison ("Harrison")	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1013 - U.S. Patent No. 4,196,556 to Russo ("Russo")	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1014 - U.S. Patent No. 9,151,058 to Leathe ("Leathe")	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1015 - U.S. Publication No. 2001/0054270 to Rice ("Rice")	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.

Evidence	Objections
Ex. 1016 - *Fire-Rated Assemblies in Commercial Construction ("The Purple Book")*, National Gypsum Properties, LLC (November 5, 2013)	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1017 - *GA-600-2012 Fire Resistance Design Manual, 20th Ed.*, Gypsum Association (June 2012).	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1018 - *2012 International Building Code*, International Code Council, June 2011 ("IBC-2012")	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1019 - WoodWorks, Four-story Wood-frame Structure over Podium Slab (2010) ("WoodWorks")).	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1020 - ASTM C1396 Standard Specification for Gypsum Board (2001).	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes

Evidence	Objections
	information that is not relevant to any ground upon which trial was instituted.
Ex. 1021 - U.S. Patent Application Publication No. 2012/0219785 to Yu et al. ("Yu").	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1022 - U.S. Patent No. 3,601,428 to Gilb	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1023 - U.S. Patent No. 3,633,950 to Gilb	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1024 - U.S. Patent No. 3,752,512 to Gilb	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.

Evidence	Objections
Ex. 1025 - U.S. Patent No. 4,480,941 to Gilb	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1026 - EP Patent No. 0210744 B1 to Adams ("Adams")	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1027 - U.S. Patent Application Pub. No. 2008/0134620 to Contasti ("Contasti")	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1029 - Ferguson, Drywall: Professional Techniques for Great Results, Taunton Press, 2012	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1030 - U.S. Patent No. 4,261,155 to Gilb ("Gilb'155")	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes

Evidence	Objections
	information that is not relevant to any ground upon which trial was instituted.
Ex. 1031 - "Mass Timber and Wood Framing," Architectural Record Magazine, McGraw Hill Construction, November 2012, pp. 165169 ("ArchRecord")	**FRE 901**: Petitioner has not produced evidence sufficient to support a finding that this item is what Petitioner claims it is. **FRE 802**: This exhibit contains inadmissible hearsay.
Ex. 1032 - U.S. Patent No. 4,714,372 to Commins ("Commins")	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1033 - ASTM C840 Standard Specification for Application and Finishing of Gypsum Board (2001)	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1034 - 2012 International Building Code	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes

Evidence	Objections
	information that is not relevant to any ground upon which trial was instituted.
Ex. 1036 - U.S. Patent App. Pub. No. 2005/0155307 to Timony ("Timony")	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1038 - The Gypsum Construction Handbook, Sixth Edition, USG Corporation, Published by John Wiley & Sons, Inc. 2009	**FRE 402**: This exhibit was not cited in the Petition. Thus, this exhibit includes information that is not relevant to any ground upon which trial was instituted.
Ex. 1041 - Wayback Machine Screenshot of Architectural Record website (November 12, 2012)	**FRE 901**: Petitioner has not produced evidence sufficient to support a finding that this item is what Petitioner claims it is.
Ex. 1042 - Wayback Machine Screenshot of Architectural Record Continuing Education Website (January 23, 2013)	**FRE 901**: Petitioner has not produced evidence sufficient to support a finding that this item is what Petitioner claims it is.

Evidence	Objections
Ex. 1043 - Wayback Machine Screenshot of Wikipedia Architectural Record Entry (December 5, 2012)	**FRE 901**: Petitioner has not produced evidence sufficient to support a finding that this item is what Petitioner claims it is.

Dated: March 12, 2025

Respectfully submitted,

/Kurt F. James/
Kurt F. James, Reg. No. 33,716

Counsel for Columbia Insurance Company

CERTIFICATE OF SERVICE

Under 37 C.F.R. § 42.6(e), the undersigned certifies that on March 12, 2025, a copy of the foregoing was served via email on the following:

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