

Richard G. A. Bone

From: Richard G. A. Bone
Sent: Monday, April 07, 2014 8:09 PM
To: jmicallef@sidley.com
Cc: jkushan@sidley.com; James Heintz (Jim.Heintz@dlapiper.com); 292
_IPR_DLAteam@dlapiper.com
Subject: Surfcast Inc.'s objections to Petitioner's exhibits in IPR2013-00292
Attachments: LTOC-ObjectionsApr7-2014-IPR2013-00292.pdf

Dear Mr. Micallef:

Please see attached letter of today's date.

Yours sincerely,

Richard Bone

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BY E-MAIL ONLY (To: jmicallef@sidley.com)

April 7, 2014

Joseph A. Micallef, Esq.
Sidley Austin LLP
1501 K Street N.W.
WASHINGTON, D.C. 20005

Re: *Microsoft Corporation v. SurfCast, Inc.*, IPR2013-00292
Patent No.: 6,724,403
Your Ref.: *Please provide*
Our Refs.: 0792-00-012Y01

Richard G. A. Bone
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Dear Mr. Micallef:

Patent owner lodges objections to Microsoft's exhibits, per 37 C.F.R. § 42.64(b)(1), and the attached listing.

Very truly yours,

/Richard G. A. Bone/

Richard G. A. Bone
Partner

cc: James M. Heintz, Esq., (DLA Piper LLP)
Jeffrey Kushan, (Sidley Austin LLP)



Appendix A
Patent Owner (“SurfCast”) Objections to Petitioner Exhibits

- Exhibit 1085** (Merriam Webster’s Collegiate Dictionary, 10th Ed. (1995) for the term “access”) SurfCast objects to this document as irrelevant.
- Exhibit 1086** (Excerpts of Microsoft Computer Dictionary, 4th Ed. (1999) for the term “access”) SurfCast objects to this document as irrelevant.
- Exhibit 1087** (Excerpts of Merriam Webster’s Collegiate Dictionary, 10th Ed. (1995) for the term “periodic”) SurfCast objects to this document as irrelevant.
- Exhibit 1088** (Excerpts of Glenn E. Weadock, Intranet Publishing for Dummies (1997)) SurfCast objects to this document as irrelevant, and incomplete.
- Exhibit 1089** (Glenn E. Weadock, Windows 98 Registry for Dummies (1998)) SurfCast objects to this document as irrelevant.
- Exhibit 1090** (GDDM, BaseProgramming Guide, Version 3, Release 2 (September 1996)) SurfCast objects to this document as irrelevant.
- Exhibit 1091** (U.S. Patent No. 5,974,567) SurfCast objects to this document as irrelevant and misleading.
- Exhibit 1092** (Glenn E. Weadock, Intranet Publishing for Dummies (1997) – Full version of Ex. 1088) SurfCast objects to this document as irrelevant.
- Exhibit 1093** (U.S. Patent 5,577,935) SurfCast objects to this document as irrelevant.
- Exhibit 1094** (U.S. Patent 7,949,687) SurfCast objects to this document as irrelevant.
- Exhibit 1095** (U.S. Patent 6,616,701) SurfCast objects to this document as irrelevant.
- Exhibit 1096** (U.S. Patent 7,139,970) SurfCast objects to this document as irrelevant.
- Exhibit 1097** (HTML 4.0 Specification (April 24, 1998)) SurfCast objects to this document as irrelevant.



- Exhibit 1098** (Scott Isaacs, Inside Dynamic HTML (1997)) SurfCast objects to this document as irrelevant.
- Exhibit 1099** (Thomas E. LaStrange, "swm: An X Window Manager Shell" (1990)) SurfCast objects to this document as irrelevant.
- Exhibit 1100** (U.S. Patent 5,982,445) SurfCast objects to this document as irrelevant.
- Exhibit 1101** (Excerpts of The American Heritage Dictionary, Second College Edition (1985) for the term "when") SurfCast objects to this document as irrelevant.
- Exhibit 1102** (Deposition Transcript of Richard Bone, dated February 19, 2014) SurfCast objects to this document as beyond the scope.
- Exhibit 1103** (Deposition Transcript of Ovid Santoro, dated February 27, 2014 (Protective Order Material)) SurfCast objects to this document as beyond the scope.
- Exhibit 1104** (Deposition Transcript of Klaus Lagermann, dated March 6, 2014) SurfCast objects to this document as beyond the scope.
- Exhibit 1105** (Deposition Transcript of Tom Dechaene, dated March 11, 2014 (Protective Order Material)) SurfCast objects to this document as beyond the scope.
- Exhibit 1106** (Deposition Transcript of Glenn Weadock, dated March 12, 2014) SurfCast objects to this document as beyond the scope.
- Exhibit 1107** (EP 1,161,716B) SurfCast objects to this document as irrelevant.
- Exhibit 1108** (U.S. Patent 3,760,364) SurfCast objects to this document as irrelevant.
- Exhibit 1109** (Redacted Deposition Transcript of Klaus Lagermann, dated June 27, 2013 (from Maine)) SurfCast objects to this document as irrelevant.
- Exhibit 1110** (Reply Expert Declaration of David Karger) SurfCast objects to this document as irrelevant, lacking foundation, assuming facts not in evidence, calling for legal conclusion, going beyond the scope of a proper reply, untimely for presenting material that could have been submitted earlier in the proceeding, and mischaracterizing evidence.