

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SILICON LABORATORIES, INC.  
Petitioner

v.

CRESTA TECHNOLOGY CORPORATION  
Patent Owner

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CASE IPR2015-00626  
Patent 7,265,792

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**PATENT OWNER'S OBJECTIONS TO EVIDENCE**

Mail Stop "PATENT BOARD"  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

Case No. IPR2015-00626  
U.S. Patent 7,265,792

## **I. INTRODUCTION**

Pursuant to 37 C.F.R. § 42.64(b)(1), the undersigned, on behalf of Cresta Technology Corporation (“Patent Owner”), hereby submits the following objections to the below listed exhibits submitted with the Petition by Silicon Laboratories, Inc. (“Silicon Labs”) for Inter Partes Review of U.S. Patent No. 7,265,792 (“the ‘792 Patent”), dated January 26, 2015 (“the petition”). Pursuant to 37 C.F.R. § 42.62, Patent Owner’s objections below apply the Federal Rules of Evidence (“F.R.E.”).

## **II. OBJECTIONS TO EVIDENCE**

### **A. GENERAL OBJECTIONS**

Patent Owner objects to each exhibit, and/or portion thereof, included with Silicon Labs’ petition, but not cited within the petition. For example, Patent Owner objects that, since such material was not cited in the petition, it has no alleged relevance to the issues on which trial has been instituted. *See, e.g.*, Institution decision, IPR2015-00626, paper 9, at page 28 (“FURTHER ORDERED that no other ground of unpatentability is authorized for this *inter partes* review”). Additionally, since this material was not discussed in the petition, Patent Owner had no opportunity to respond to Silicon Labs’ purported contentions (if any) regarding the same. Accordingly, such material is irrelevant and its consideration would be prejudicial. F.R.E. 402, 403. Further Patent Owner objects as irrelevant to each

exhibit which was not identified by the Board as a ground on which trial was instituted.

Patent Owner further objects to each exhibit included with Silicon Labs' petition that Silicon Labs may contend is a printed publication prior art reference but for which Silicon Labs did not provide evidence to support that contention, pursuant to F.R.E. 104 (admissibility conditioned on fact), 402 (relevance) and 403 (unfair prejudice).

Patent Owner objects to each and every exhibit included with Silicon Labs' petition that is not a complete copy of the subject exhibit pursuant to F.R.E. 106, 403 and 901. The entirety of a document should be considered to place the document in its proper context. For example, analysis of a patent should consider the entirety of the patent's intrinsic record, such as the patent's file history and any PTO-issued certifications (such as reexamination certifications and certificates of correction, should any exist). As another example, excerpts of a document should be considered in light of the whole document from which they are taken. Silicon Labs' expert's analysis of incomplete documents is unreliable and incomplete at least to the extent that it does not consider the entire document in its proper context.

Patent Owner objects to each and every exhibit included with Silicon Labs' petition that Silicon Labs purports to offer for the truth of the matter asserted, under

F.R.E. 801, 802, and 805. Silicon Labs' petition contains no evidence establishing any exceptions to the rules against hearsay.

Patent Owner objects to each and every exhibit included with Silicon Labs' petition that is not authenticated, under F.R.E. 901.

Patent Owner objects to each and every exhibit included with Silicon Labs' petition that was not properly taken, sought, or filed in accordance with the rules for such evidence in IPRs. Additionally, Patent Owner objects to each and every exhibit included with Silicon Labs' petition for which a specification or drawing of a patent is offered as evidence to prove more than simply what that specification or drawing describes. If there is data in the specification or a drawing upon which a party intends to rely to prove the truth of the data, an affidavit by an individual having first-hand knowledge of how the data was generated must be filed. 37 C.F.R. 42.61.

Patent Owner objects to each and every exhibit included with Silicon Labs' petition for which no party has offered any personal knowledge as to the facts contained in that exhibit, under F.R.E. 602.

Patent Owner objects to each and every exhibit included with Silicon Labs' petition that purports to include expert opinions for which the factual bases for those opinions have not been disclosed, or for which the expert used unreliable analysis or methods, under F.R.E. 702 and 703, and 37 C.F.R. § 42.65.

Patent Owner objects to each and every exhibit that was not properly taken, sought, or filed in accordance with the rules for such evidence in IPRs. 37 C.F.R. 42.61.

Patent Owner objects to each and every exhibit on the grounds and to the extent they present evidence in an improper form under 37 C.F.R. 42.63.

**B. OBJECTIONS TO EXHIBIT 1002 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1002, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). This exhibit reflects information collected and/or prepared for a separate proceeding under different rules, standards, and/or law, and for at least this reason is not relevant to the current trial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**C. OBJECTIONS TO EXHIBIT 1003 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1003, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). This exhibit reflects information collected and/or prepared for a separate proceeding under different rules, standards, and/or law, and for at least this reason is not relevant to the current trial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**D. OBJECTIONS TO EXHIBIT 1004 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1004, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901

(Authentication). See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**E. OBJECTIONS TO EXHIBIT 1005 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1005, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**F. OBJECTIONS TO EXHIBIT 1006 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1006, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**G. OBJECTIONS TO EXHIBIT 1007 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1007, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be



prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**H. OBJECTIONS TO EXHIBIT 1008 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1008, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**I. OBJECTIONS TO EXHIBIT 1009 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1009, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 42.65 (Expert testimony that does not disclose the underlying facts or data and improper discussion of patent law)), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant

evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). Patent Owner objects to each and every paragraph of this exhibit that has not been cited in Silicon Labs' petition at least because each paragraph not cited in in Silicon Labs' petition has no alleged relevance to the trial and its consideration would be prejudicial as Patent Owner has been denied opportunity to respond to in Silicon Labs' contentions, if any. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**J. OBJECTIONS TO EXHIBIT 1011 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1011, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 42.65 (Expert testimony that does not disclose the underlying facts or data and improper discussion of patent law)), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). See also the

discussion of objections based on these rules in II.A above, incorporated herein by reference.

**K. OBJECTIONS TO EXHIBIT 1012 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1012, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. This exhibit is not cited in Silicon Labs' petition, so its alleged relevance to the trial has not been identified by Silicon Labs' and its consideration would be prejudicial as Patent Owner has been denied opportunity to respond to Silicon Labs' contentions, if any. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**L. OBJECTIONS TO EXHIBIT 1013 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1013, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. This exhibit is not cited in Silicon Labs' petition, so its alleged relevance to the trial has not been identified by Silicon Labs' and its consideration would be prejudicial as Patent Owner has been denied opportunity to respond to Silicon Labs' contentions, if any. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**M. OBJECTIONS TO EXHIBIT 1014 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1014, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion,

waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). This exhibit reflects information collected and/or prepared for a separate proceeding under different rules, standards, and/or law, and for at least this reason is not to relevant the current trial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**N. OBJECTIONS TO EXHIBIT 1015 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1015, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**O. OBJECTIONS TO EXHIBIT 1016 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1016, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**P. OBJECTIONS TO EXHIBIT 1017 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1017, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E.

801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**Q. OBJECTIONS TO EXHIBIT 1018 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1018, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**R. OBJECTIONS TO EXHIBIT 1019 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1019, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**S. OBJECTIONS TO EXHIBIT 1020 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1020, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.



**T. OBJECTIONS TO EXHIBIT 1021 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1021, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**U. OBJECTIONS TO EXHIBIT 1022 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1022, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E.

801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. This exhibit is not cited in Silicon Labs' petition, so its alleged relevance to the trial has not been identified by Silicon Labs' and its consideration would be prejudicial as Patent Owner has been denied opportunity to respond to Silicon Labs' contentions, if any. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**V.     OBJECTIONS TO EXHIBIT 1023 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1023, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**W. OBJECTIONS TO EXHIBIT 1024 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1024, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**X. OBJECTIONS TO EXHIBIT 1025 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1025, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit

is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**Y. OBJECTIONS TO EXHIBIT 1026 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1026, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**Z. OBJECTIONS TO EXHIBIT 1027 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1027, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**AA. OBJECTIONS TO EXHIBIT 1028 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1028, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. This exhibit is not part of the trial and thus is irrelevant and its

consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**BB. OBJECTIONS TO EXHIBIT 1029 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1029, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**CC. OBJECTIONS TO EXHIBIT 1030 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1030, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402

(Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**DD. OBJECTIONS TO EXHIBIT 1031 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1031, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.61 (Figure hearsay), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay). See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**EE. OBJECTIONS TO EXHIBIT 1032 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1032, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**FF. OBJECTIONS TO EXHIBIT 1033 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1033, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack



of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**GG. OBJECTIONS TO EXHIBIT 1034 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1034, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. This exhibit is not cited in Silicon Labs' petition, so its alleged relevance to the trial has not been identified by Silicon Labs'

and its consideration would be prejudicial as Patent Owner has been denied opportunity to respond to Silicon Labs' contentions, if any. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**HH. OBJECTIONS TO EXHIBIT 1035 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1035, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. This exhibit is not cited in Silicon Labs' petition, so its alleged relevance to the trial has not been identified by Silicon Labs' and its consideration would be prejudicial as Patent Owner has been denied opportunity to respond to Silicon Labs' contentions, if any. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

## **II. OBJECTIONS TO EXHIBIT 1036 AND ANY REFERENCE TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1036, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. This exhibit is not cited in Silicon Labs' petition, so its alleged relevance to the trial has not been identified by Silicon Labs' and its consideration would be prejudicial as Patent Owner has been denied opportunity to respond to Silicon Labs' contentions, if any. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

## **JJ. OBJECTIONS TO EXHIBIT 1037 AND ANY REFERENCE TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1037, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. This exhibit is not cited in Silicon Labs' petition, so its alleged relevance to the trial has not been identified by Silicon Labs' and its consideration would be prejudicial as Patent Owner has been denied opportunity to respond to Silicon Labs' contentions, if any. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**KK. OBJECTIONS TO EXHIBIT 1038 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1038, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 104 (Admissibility conditioned on fact), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 702, 703 (Unreliable expert testimony), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Silicon Labs has not established that this exhibit qualifies as a printed publication. This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. This exhibit is not cited in Silicon Labs' petition, so its alleged relevance to the trial has not been identified by Silicon Labs' and its consideration would be prejudicial as Patent Owner has been denied opportunity to respond to Silicon Labs' contentions, if any. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**LL. OBJECTIONS TO EXHIBIT 1039 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1039, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion,

waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). This exhibit reflects information collected and/or prepared for a separate proceeding under different rules, standards, and/or law, and for at least this reason is not to relevant the current trial. This exhibit is not part of the trial and thus is irrelevant and its consideration would be prejudicial. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

**MM. OBJECTIONS TO EXHIBIT 1040 AND ANY REFERENCE  
TO/RELIANCE THEREON**

Patent Owner hereby objects to Exhibit 1040, and any portions or excerpts thereof contained in or relied upon by Silicon Labs' declarants or the petition itself.

Grounds for objection: 37 C.F.R. § 42.61 (Admissibility of evidence), 37 C.F.R. § 42.63 (Form of evidence), F.R.E. 106 (Completeness), F.R.E. 402 (Relevance), F.R.E. 403 (Excluding relevant evidence for prejudice, confusion, waste of time, or other reasons), F.R.E. 602 (Lack of personal knowledge), F.R.E. 801, 802 (Impermissible hearsay), F.R.E. 805 (Hearsay within hearsay), F.R.E. 901 (Authentication). Patent Owner maintains and reiterates objections made in the transcript record. This exhibit reflects information collected and/or prepared for a separate proceeding under different rules, standards, and/or law, and for at least this reason is not to relevant the current trial. This exhibit is not part of the trial and thus

is irrelevant and its consideration would be prejudicial. This exhibit is not cited in Silicon Labs' petition, so its alleged relevance to the trial has not been identified by Silicon Labs' and its consideration would be prejudicial as Patent Owner has been denied opportunity to respond to Silicon Labs' contentions, if any. See also the discussion of objections based on these rules in II.A above, incorporated herein by reference.

### III. CONCLUSION

For at least these reasons, the Patent Owner objects to the above identified Exhibits submitted with Silicon Labs' Petition for Inter Partes Review of the '792 patent, dated January 26, 2015.

Date: August 28, 2015

Respectfully submitted,

/Michael R. Fleming/

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## **CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on August 28, 2015, a copy of the foregoing document **PATENT OWNER'S OBJECTIONS TO EVIDENCE** were served by electronic mail, as agreed to by the parties, upon the following:

<i>Lead Counsel for Petitioner</i> <b>SILICON LABORATORIES, INC.</b>	<i>Back-up Counsel for Petitioner</i> <b>SILICON LABORATORIES, INC.</b>
<p style="text-align: center;">Peter Ayers <a href="mailto:peter@leehayes.com">peter@leehayes.com</a></p> <p style="text-align: center;"><b>LEE &amp; HAYES, PLLC</b> 13809 Research Blvd., Suite 405 Austin, Texas 78750</p>	<p style="text-align: center;">John Shumaker <a href="mailto:jshumaker@leehayes.com">jshumaker@leehayes.com</a></p> <p style="text-align: center;">Brian Mangum <a href="mailto:brianm@leehayes.com">brianm@leehayes.com</a></p> <p style="text-align: center;"><b>LEE &amp; HAYES, PLLC</b> 13809 Research Blvd., Suite 405 Austin, Texas 78750</p>

/Michael R. Fleming /  
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