

**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 No. 7,265,792

Title: Television Receiver for Digital and Analog Television Signals

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**PETITIONER'S OBJECTIONS TO  
PATENT OWNER'S EVIDENCE**

**PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

Pursuant to 37 C.F.R. 42.64(b)(1), Petitioner submits the following objections to Patent Owner's Evidence, which was served by Patent Owner on November 30, 2015. These objections are timely, having been served within five business days.

EXHIBIT	OBJECTION(S)
2003 – Declaration of Ion E. Opris, Ph.D. Regarding the Validity of 7,265,792 from IPR2014-00728, ¶¶37-75, 77-104, 106-110	<b>FRE 402:</b> The exhibit is not relevant to any ground upon which trial was instituted. For example, Patent Owner has waived its arguments regarding any of the Board's claim constructions as well as the patentability of the foundational claims by not raising these issues in its Patent Owner Response. In addition, Patent Owner has failed to demonstrate a sufficient nexus between the purported secondary considerations of non-obviousness allegedly disclosed in the exhibit and the invention claimed by the patent-at-issue.
2004 –Second Declaration of Ion E. Opris, Ph.D. Regarding Ex. 2050 from IPR2014-00809	<b>FRE 402:</b> The exhibit is not relevant to any ground upon which trial was instituted. For example, Patent Owner has waived its arguments regarding any of the Board's claim constructions as well as the patentability of the foundational claims by not raising these issues in its Patent Owner Response.
2006 – Silicon Labs, Developing Economical, Mainstream Television Designs with Next-Generation Silicon TV Tuner ICs	<b>FRE 402:</b> The exhibit is not relevant to any ground upon which trial was instituted. For example, Patent Owner has failed to demonstrate a sufficient nexus between the purported secondary considerations of non-obviousness allegedly disclosed in the exhibit and the invention claimed by the patent-at-issue. In addition, Patent Owner does not rely on this exhibit in its Patent Owner response.

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2010 – HSP43220 Data Sheet, September 2000, File No. 2486.8, Decimating Digital Filter	<b>FRE 402:</b> The exhibit is not relevant to any ground upon which trial was instituted. For example, Patent Owner has waived its arguments regarding any of the Board’s claim constructions as well as the patentability of the foundational claims by not raising these issues in its Patent Owner Response. In addition, Patent Owner does not rely on this exhibit in its Patent Owner response.
2011 – HSP43220 Data Sheet, December 1996, File No. 2486.8, Decimating Digital Filter	<b>FRE 402:</b> The exhibit is not relevant to any ground upon which trial was instituted. For example, Patent Owner has waived its arguments regarding any of the Board’s claim constructions as well as the patentability of the foundational claims by not raising these issues in its Patent Owner Response. In addition, Patent Owner does not rely on this exhibit in its Patent Owner response.
2031 – <i>Silicon Laboratories, Inc. v. Cresta Technology Corporation</i> , No. 14-CV-03227-PSG, Rebuttal Expert Report of Douglas Holberg, Ph.D.	<b>FRE 402:</b> The exhibit is not relevant to any ground upon which trial was instituted. For example, this expert report was submitted in a case involving a different patent using a different claim construction methodology and a different standard of proof.  <b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.
2032 – Declaration of Ion E. Opris, Ph.D. Regarding the Validity of USPN 7,265,792,	<b>FRE 402:</b> The exhibit is not relevant to any ground upon which trial was instituted. For example, Patent Owner has waived its arguments regarding any of the Board’s claim constructions (¶¶50-67) as

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¶¶50-67, 71, 74, 83, 88, 99	well as the patentability of the foundational claims (¶¶71, 74, 83, 88, 99) by not raising these issues in its Patent Owner Response. In addition, Patent Owner does not rely on these paragraphs in its Patent Owner response.
2036 – Electronic Design, Interview: Silicon Labs CEO Tyson Tuttle Discusses the Mixed-Signal IC Business	<p><b>FRE 402:</b> The exhibit is not relevant to any ground upon which trial was instituted. For example, Patent Owner has failed to demonstrate a sufficient nexus between the purported secondary considerations of non-obviousness allegedly disclosed in the exhibit and the invention claimed by the patent-at-issue.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p> <p><b>FRE 901:</b> The exhibit is inadmissible because Patent Owner has not submitted evidence sufficient to support a finding that the item is what Patent Owner claims it is.</p>
2037 – ECN 2008 Readers Choice Tech Awards	<b>FRE 402:</b> The exhibit is not relevant to any ground upon which trial was instituted. For example, Patent Owner has failed to demonstrate a sufficient nexus between the purported secondary considerations of non-obviousness allegedly disclosed in the exhibit and the invention claimed

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	<p>by the patent-at-issue.</p> <p><b>FRE 403:</b> The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p><b>FRE 802:</b> The exhibit is inadmissible hearsay if offered to prove the truth of any matter allegedly asserted therein.</p> <p><b>FRE 901:</b> The exhibit is inadmissible because Patent Owner has not submitted evidence sufficient to support a finding that the item is what Patent Owner claims it is.</p>

Dated: December 7, 2015

/Peter J. Ayers/

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of December, 2015, the foregoing Petitioner's Objections to Patent Owner's Evidence Pursuant to 37 C.F.R. §42.64(b)(1) was served upon Patent Owner's attorney(s) of record by emailing to the following addresses:

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