Entered: March 17, 2016

## UNITED STATES PATENT AND TRADEMARK OFFICE

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#### BEFORE THE PATENT TRIAL AND APPEAL BOARD

## NVIDIA CORP. Petitioner

v.

## SAMSUNG ELECTRONICS CO., LTD.

Patent Owner

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Case IPR2015-01327 U.S. Patent No. 6,287,902 B1

Before JAMESON LEE, PATRICK R. SCANLON, and JUSTIN BUSCH, *Administrative Patent Judges*.

# PETITIONER'S OBJECTIONS TO EVIDENCE SUBMITTED WITH PATENT OWNER'S RESPONSE

Under 37 C.F.R. § 42.64(b)(1), Petitioner NVIDIA Corp. ("Petitioner")

submits the following objections to evidence submitted by Samsung Electronics

Co., Ltd. ("Patent Owner"). Petitioner's objections apply equally to Patent

Owner's reliance on this evidence in any subsequently-filed documents or further

proceedings in this matter. These objections are timely, having been filed within

five business days of service of Patent Owner's Response (Paper 17) in this

proceeding.

Notwithstanding these objections, Petitioner expressly reserves the right to

rely on any evidence submitted by Patent Owner, including on the ground that such

evidence constitutes a party admission.

**Objections** 

**Exhibits 2003, 2004** 

Petitioner objects to Exhibits 2003 and 2004 under Rules 401-403 of the

Federal Rules of Evidence on the grounds that these exhibits contain evidence not

relevant to issues in this proceeding, and because Patent Owner never relied on

these exhibits in the Patent Owner's Response.

Respectfully submitted,

Dated: March 17, 2016

By: /Robert Steinberg/

Robert Steinberg (Reg. No. 33144)

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Counsel for Petitioner

## **CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e) and the parties' agreement to electronic service on June 22, 2015, I certify that on this 17th day of March, 2016, a copy of **Petitioner's Objections to Evidence Submitted With Patent Owner's Response** was served by electronic mail on Patent Owner's lead and backup counsel at the following email addresses:

Naveen Modi (Reg. No. 46,224) Joseph E. Palys (Reg. No. 46,508) nVidia-Samsung-IPR@paulhastings.com

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