

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TCL CORPORATION; TCL COMMUNICATION TECHNOLOGY HOLDINGS,
LTD.; TCT MOBILE LIMITED; TCT MOBILE INC.; AND TCT MOBILE (US)
INC.

Petitioners,

v.

TELEFONAKTIEBOLAGET LM ERICSSON
Patent Owner.

Case IPR2015-01674

U.S. Patent No. RE43,931

PETITIONERS' OBJECTIONS TO PATENT OWNER'S SUPPLEMENTAL
EVIDENCE

Petitioners TCL Corporation; TCL Communication Technology Holdings, Ltd.; TCT Mobile Limited; TCT Mobile Inc.; and TCT Mobile (US) Inc. (collectively, "TCL") serve the following objections pursuant to 37 C.F.R. § 42.64(b)(1) and the Federal Rules of Evidence ("FRE") to supplemental evidence submitted by Patent Owner Telefonaktiebolaget LM Ericsson ("Ericsson") with its *inter partes* review patent owner response ("Response") related to U.S. Patent No. RE43,931 (the "'931 patent"). These objections are timely presented as they are served and submitted within five business days of service of the Patent Owner's Supplemental Evidence on July 12, 2016.

**IDENTIFICATION OF CHALLENGED EVIDENCE AND GROUNDS
FOR OBJECTIONS**

A. Exhibit 2077

TCL objects to Exhibit 2077 under FRE 402 and FRE 403 because it is irrelevant and its probative value is substantially outweighed by the danger of wasting time in this compressed proceeding. Additionally, this exhibit is hearsay under FRE 801 to the extent the declarant is not made available for deposition and as such is inadmissible under FRE 802. No testimony or other evidence was presented to support a finding that the individual exhibits referenced in Exhibit 2077 or its contents are what the proponent claims. TCL hereby incorporates by

reference and maintains its objections to the exhibits relied on or cited in Exhibit 2077 presented in its objections submitted June 27, 2016.

B. Exhibit 2078

TCL objects to Exhibit 2078 under FRE 402 and FRE 403 because it is irrelevant and its probative value is substantially outweighed by the danger of wasting time in this compressed proceeding. Additionally, this exhibit is hearsay under FRE 801 to the extent the declarant is not made available for deposition and as such is inadmissible under FRE 802. No testimony or other evidence was presented to support a finding that the individual exhibits referenced in Exhibit 2078 or its contents are what the proponent claims. TCL hereby incorporates by reference and maintains its objections to the exhibits relied on or cited in Exhibit 2078 presented in its objections submitted June 27, 2016.

AUTHORIZATION OF FEES

The Patent Trial and Appeal Board is hereby authorized to charge any fees associated with *inter partes* review number IPR2015-01674 of U.S. Patent No. RE43,931 to its Deposit Account No. 50-0310.

PETITIONERS' Objections to Supplemental Evidence
Case IPR2015-01674
U.S. Patent No. RE43,931

Dated: July 19, 2016

Respectfully submitted,

/Jeffrey G. Killian/

Jeffrey G. Killian, Reg. No. 50,891

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW

Washington, DC 20004

Tel: 202-739-5592

Fax: 202-739-3001

Attorney for Petitioners TCL Corporation;
TCL Communication Technology Holdings,
Ltd.; TCT Mobile Limited; TCT Mobile
Inc.; and TCT Mobile (US) Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Petitioners' Objections to Supplemental Evidence was served on July 19, 2016 on the counsel of record for the Patent Owner by filing this document through the Patent Review Processing System as well as delivering a copy via electronic mail to the following addresses:

Todd Baker
Sameer Gokhale
Andrew Harry
Lisa Mandrusiak
Alex Kuo
Oblon, McClelland, Maier & Neustadt, LLP
1940 Duke Street
Alexandria, VA 22314
CPDocketBaker@oblon.com
CPDocketGokhale@oblon.com
CPDocketHarry@oblon.com
CPDocketMandrusiak@oblon.com
CPDocketKuo@oblon.com

July 19, 2016

Respectfully submitted,

By /Jeffrey G. Killian/
Jeffrey G. Killian
Registration No.: 50,891