

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA, INC.,  
Petitioner

v.

IMAGE PROCESSING TECHNOLOGIES LLC,  
Patent Owner

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Case IPR2017-00347  
U.S. Patent No. 8,805,001 B2

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**PAPER NO. 14**

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

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner, Image Processing Technologies LLC (“IPT”) objects to the admissibility of the following exhibits filed by Petitioners.

In this paper, a reference to “FRE” means the Federal Rules of Evidence and “’001 patent” means U.S. Patent No. 8,805,001.

IPT’s objections are as follows:

**Exhibit 1002 ¶¶ 23–30 (Hart Declaration)**

Patent Owner objects to these paragraphs of Exhibit 1002 under FRE 402 (relevance) and FRE 403 (confusing, waste of time).

**Exhibit 1002 ¶¶ 116–143 & Table on Pages 97–114 (Hart Declaration)**

Patent Owner objects to these paragraphs and the table of Exhibit 1002 under FRE 802 (hearsay). Patent Owner also objects to these paragraphs and the table of Exhibit 1002 under FRE 402 (relevance) and FRE 403 (confusing, waste of time) at least because the paragraphs are not relevant to any issue in this IPR because the grounds for which they were submitted have not been instituted.

**Exhibit 1005 (Gilbert)**

Patent Owner objects to Exhibit 1005 under FRE 802 (hearsay). Patent Owner also objects to Exhibit 1005 under FRE 402 (relevance) and FRE 403 (unfairly prejudicial, confusing, waste of time) at least because the document is not

relevant to any issue in this IPR proceeding because the disclosure is not prior art and/or Petitioner has not met its burden to show the exhibit to be prior art.

**Exhibit 1008 (Trier)**

Patent Owner objects to Exhibit 1008 under FRE 901 because authenticating information has not been provided. Patent Owner also objects to Exhibit 1008 under FRE 402 (relevance) and FRE 403 (unfairly prejudicial, confusing, waste of time) at least because the document is not discussed in the Declaration of Dr. Hart (Exhibit 1002) nor cited to or discussed in the Petition.

**Exhibit 1009 (Glauberger)**

Patent Owner objects to Exhibit 1009 under FRE 901 because authenticating information has not been provided. Patent Owner also objects to Exhibit 1009 under FRE 402 (relevance) and FRE 403 (unfairly prejudicial, confusing, waste of time) at least because the document is not discussed in the Declaration of Dr. Hart (Exhibit 1002) nor cited to or discussed in the Petition.

**Exhibit 1010 (Grenier Declaration)**

Patent Owner objects to Exhibit 1010 under FRE 802 (hearsay).

Dated: June 9, 2017

/s/Chris J. Coulson/

Chris J. Coulson (Reg. No. 61,771)

Lead Counsel for Patent Owner

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**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on June 9, 2017, the foregoing *Patent Owner's Objections to Petitioner's Evidence* was served via electronic mail upon the following counsel of record for the Petitioner:

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