

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC.

Petitioner

v.

BROADCOM CORPORATION

Patent Owners

CASE IPR2017-01544

Patent No. 7,342,967

PETITIONER'S OBJECTIONS TO PATENT OWNER'S EXHIBITS

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner objects to the following Patent Owner exhibits:

I. Lack of Authentication

Petitioner objects to Exhibit 2004 under FRE 901 as not properly authenticated. Patent Owner has failed to produce evidence sufficient to support a finding that this exhibit is what Patent Owner claims it is.

II. Not in Form of Exhibit and Improper Incorporation by Reference

Petitioner objects to Exhibits 2002 and 2003. Each of these exhibits fail to comply with 37 CFR 42.63(a) and 37 CFR 42.6(a)(3).

For example, each of these exhibits contains one or more of: hyperlinks to external sources (e.g., web pages or websites) or references to other works (e.g., non-patent literature). Petitioner objects to these exhibits to the extent that they cite to documents or things that are not part of the evidence or the record. *See* 37 CFR 42.63(a). Petitioner also objects to these exhibits to the extent that they attempt to incorporate said documents or things by reference. *See* 37 CFR 42.6(a)(3).

III. Improper Expert Testimony

Petitioner objects under FRE 703 to all portions of Exhibit 2002 that rely on improper evidence, by citing Exhibits 2003 and 2004 that are inadmissible for at least the reasons discussed in the above sections.

Date: March 26, 2018

Respectfully submitted,

By: /Erika H. Arner/

Erika H. Arner

(Registration No. 57,540)

FINNEGAN, HENDERSON, FARABOW,

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Attorney for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies a copy of the foregoing **PETITIONER'S OBJECTIONS TO PATENT OWNER'S EXHIBITS** was served on March 26, 2018, via electronic mail directed to counsel of record for the Patent Owner at the following:

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Dated: March 26, 2018

By: /Lauren K. Young/
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