UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner

v.

UNILOC LUXEMBOURG, S.A.[1]
Patent Owner

Case: IPR2017-01801
U.S. Patent No. 8,995,433

JOINT FILING OF
OBJECTIONS TO DEMONSTRATIVES

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[1] Uniloc's updated mandatory notice filed on August 27, 2018, indicates that the owner of U.S. Patent No. 8,995,433 is now Uniloc 2017 LLC. (Paper 18.)

Samsung's Objections to Demonstratives

The following slides belatedly attempt to introduce new arguments and evidence: 5 ("'message content 406' is not an 'object field,'" "three distinct elements," "only description of message content 406," graphics), 7 (graphics), 10 (Ex. 2001 at ¶¶ 40-46, 48 are not relied upon), 11 (Ex. 2007 not an exhibit or relied upon in IPR2017-01797), 12 ("relies solely on Griffin"), 16 ("relies exclusively on Low's description" of connect/disconnect), 17 ("At most…"), 22 (referenced proceedings not discussed), 23 (IPR2017-02085 not discussed), 25 (same), 26 (same), 27 (discussion of 26 IPRs), 32 (Ex. 2001 at ¶ 53 not relied upon for "device-specific information" argument), 34 ("This is true regardless…"; "The Board further noted…"), 40 (IPR2017-02085 not discussed), 54 (argument regarding "queuing"), 55 (Ex. 2001 at ¶ 34 not relied on for this limitation), 57 ("Petitioner's reliance…"), 58 (arguments and citations related to Ex. 2004).

Petitioner requests a pre-hearing call or additional time at the hearing to address these issues.

Uniloc's Objections to Demonstratives

1. Slides 12–24 rely on new claim construction argument presented for the first time in Petitioner's Reply that is outside the proper scope of the Reply. See, e.g., IPR2017-01799 at 6 n.4.
2. Slides 31–33 rely on new argument concerning the "attaching" limitations, presented for the first time in Petitioner's Reply, that is outside the proper scope of the Reply.
3. Slides 36–39 rely on new argument concerning the "controlling" limitations, presented for the first time in Petitioner's Reply, that is outside the proper scope of the Reply.
4. Slides 18, 24, 31–32, 40, 63, 74, 80, 88, 97, and 101 purport to rely on selected excerpts from cross-examination testimony that is outside the scope of Doctor Easttom's declaration and that violate the rule of completeness.
5. Petitioner's slides fail to properly refer to Patent Owner's expert by his proper title "Doctor Easttom."

Patent Owner submits that it is unnecessary to have a pre-hearing call or additional time at the hearing to address these issues.

Respectfully submitted,

Dated: October 23, 2018

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that I caused to be served on the counsel for Patent Owner a true and correct copy of the foregoing Joint Filing of Objections To Demonstratives by electronic means on October 23, 2018 at the following address of record:

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