

Filed on behalf of: Tessera Advanced Technologies, Inc.

Entered: October 16, 2018

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
AND SAMSUNG SEMICONDUCTOR, INC.,
Petitioner,

v.

TESSERA ADVANCED TECHNOLOGIES, INC.,
Patent Owner.

Case IPR2018-00798
U.S. Patent No. 6,954,001 B2

Before BARBARA A. PARVIS, ROBERT J. WEINSCHENK, and SCOTT B.
HOWARD, *Administrative Patent Judges*.

PATENT OWNER'S OBJECTIONS TO PETITIONERS' EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Tessera Advanced Technologies, Inc. ("Tessera") respectfully submits the following objections to evidence submitted by Petitioners Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively, "Samsung"). Tessera's objections apply equally to Samsung's reliance on this evidence in any subsequently-filed documents or further proceedings in this matter. These objections are timely because they are being filed and served within ten (10) business days of the institution of the trial. Notwithstanding these objections, Tessera expressly reserves the right to rely on any evidence submitted by Samsung, including on the ground that such evidence constitutes a party admission.

Objections

Exhibit 1002 (Hatalis Declaration)

Tessera objects to this exhibit as inadmissible hearsay under FRE 801 and 802 that does not fall under any exceptions, including those of FRE 803, 804, 805, or 807. Tessera further objects to this exhibit as improper expert testimony under FRE 702, 703, and 37 C.F.R. § 42.65, to the extent it impermissibly acts as a conduit for hearsay, including the hearsay objected to herein, and does not rely on the kinds of facts or data that experts in the relevant field would reasonably rely on in forming an opinion on the subject without providing the underlying facts data, and other required disclosures.

Respectfully submitted,

Dated: October 16, 2018

By: / Matthew J. Moore /

Matthew J. Moore (Reg. No. 42,012)
matthew.moore@lw.com
Robert Steinberg (Reg. No. 33,144)
bob.steinberg@lw.com
Jonathan M. Strang (Reg. No. 61,724)
jonathan.strang@lw.com
Latham & Watkins LLP
555 Eleventh Street, NW, Ste. 1000
Washington, DC 20004-1304
Telephone: 202.637.2200
Fax: 202.637.2201

Charles H. Sanders (Reg. No. 47,053)
charles.sanders@lw.com
Latham & Watkins LLP
200 Clarendon Street
Boston, MA 02116
Telephone: 617.948.6000
Fax: 617.948.6001

*Counsel for Patent Owner
Tessera Advanced Technologies, Inc.*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), I certify that on this 16th day of October, 2018, a copy of **Patent Owner's Objections to Petitioners' Evidence** was served by electronic mail on Petitioner's lead and backup counsel at the following email addresses:

John Kappos (Reg. No. 37,861)
jkappos@omm.com
O'Melveny & Myers LLP
610 Newport Center Drive, 17th Floor
Newport Beach, California 92660
Telephone: 949.823.6900

Brian M. Berliner (Reg. No. 34,549)
bberliner@omm.com
Ryan Yagura (Reg. No. 47,191)
ryagura@omm.com
Nicholas Whilt (Reg. No. 72,081)
nwhilt@omm.com
Xin-Yi Zhou (Reg. No. 63,366)
vzhou@omm.com
O'Melveny & Myers LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071
Telephone: 213.430.6000
TESSERASAMSUNGOMM@omm.com

By: / Matthew J. Moore /

Matthew J. Moore (Reg. No. 42,012)
matthew.moore@lw.com
Latham & Watkins LLP
555 Eleventh Street, NW, Ste. 1000
Washington, DC 20004-1304
Telephone: 202.637.2200

IPR2018-00798 (USP 6,954,001)

Patent Owner's Objections to Evidence

Fax: 202.637.2201

Counsel for Patent Owner
Tessera Advanced Technologies, Inc.