

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ARROWS UP, LLC
Petitioner,

v.

OREN TECHNOLOGIES, LLC
Patent Owner.

Case IPR2018-01230
Patent 9,248,772 B2

PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE

Pursuant to 37 C.F.R. § 42.64, Petitioner hereby objects to Patent Owner's exhibits as follows.

Exhibit	Objections
2001 – Patent Assignments for Oren Technologies	<p>Petitioner objects to this exhibit as irrelevant under Fed. R. Evid. 401 and 402, as the number of patents assigned to Patent Owner is not relevant to the issues in this proceeding.</p> <p>Petitioner objects that this exhibit is inadmissible under Fed. R. Evid. 403 because it is more prejudicial than probative, wastes time, and is not helpful to the trier of fact.</p>
2003 – 2018-09-17 SandBox's Response to AU's Partial Motion to Dismiss and/or Strike SandBox's First Amended Answer and Counterclaims	<p>Petitioner objects to this exhibit as irrelevant under Fed. R. Evid. 401 and 402, as other litigations between the parties and related entities are not relevant to the issues in this proceeding.</p> <p>Petitioner objects that this exhibit is inadmissible under Fed. R. Evid. 403 because it is more prejudicial than probative, wastes time, and is not helpful to the trier of fact.</p> <p>Petitioner objects that this exhibit is an inadmissible hearsay statement under Fed. R. Evid. 801 and 802.</p>
2004 – Mutual Confidentiality and Non-Disclosure Agreement	<p>Petitioner objects to this exhibit as irrelevant under Fed. R. Evid. 401 and 402, as other litigations between the parties and related entities are not relevant to the issues in this proceeding.</p> <p>Petitioner objects that this exhibit is inadmissible under Fed. R. Evid. 403 because it is more prejudicial than probative, wastes time, and is not helpful to the trier of fact.</p>
2005 – Agreed Injunction and Final Judgment	<p>Petitioner objects to this exhibit as irrelevant under Fed. R. Evid. 401 and 402, as other litigations between the parties</p>

	<p>and related entities are not relevant to the issues in this proceeding.</p> <p>Petitioner objects that this exhibit is inadmissible under Fed. R. Evid. 403 because it is more prejudicial than probative, wastes time, and is not helpful to the trier of fact.</p>
2006 – Final Judgment	<p>Petitioner objects to this exhibit as irrelevant under Fed. R. Evid. 401 and 402, as other litigations between the parties and related entities are not relevant to the issues in this proceeding.</p> <p>Petitioner objects that this exhibit is inadmissible under Fed. R. Evid. 403 because it is more prejudicial than probative, wastes time, and is not helpful to the trier of fact.</p>

Dated: January 28, 2019

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/ Allison Lucier

Allison Lucier

Reg. No. 70,205

allison.lucier@hklaw.com

HOLLAND & KNIGHT LLP

10 St. James Ave

Boston, MA 02116

Telephone: (617) 305-2132

Facsimile: (617) 523-6850

Counsel for Arrows Up, LLC

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on January 28, 2019, a copy of this PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE was served via email on lead counsel for Patent Owner, as consented to by the parties:

Gianni Cutri (gcutri@kirkland.com)

Service was also made via email on Patent Owner's back-up counsel:

Adam Kaufmann (adam.kaufmann@kirkland.com)
Eugene Goryunov (eugene.goryunov@kirkland.com)
Kyle Kantarek (kyle.kantarek@kirkland.com)

By /s/ Allison Lucier
Allison Lucier
Reg. No. 70,205
allison.lucier@hklaw.com
HOLLAND & KNIGHT LLP
10 St. James Ave
Boston, MA 02116
Telephone: (617) 305-2132
Facsimile: (617) 523-6850

Counsel for Arrows Up, LLC