

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

ONE WORLD TECHNOLOGIES, INC., D/B/A TECHTRONIC
INDUSTRIES POWER EQUIPMENT,
Petitioner,

v.

CHERVON (HK) LIMITED,
Patent Owner.

Case No. IPR2020-00886
Patent No. 9,826,686

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Mail Stop PATENT BOARD
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Chervon (HK) Limited (“Patent Owner”) hereby objects to the admissibility of evidence submitted by Petitioner One World Technologies, Inc. d/b/a Techtronic Industries Power Equipment (“Petitioner”) with its Petitioner’s Reply to Patent Owner’s Response, as set forth below. The following exhibits are inadmissible based on either the rules of these proceedings or the Federal Rules of Evidence (“FRE”).

Patent Owner objects to Exhibit 1041 (Excerpt of Fred P. Smith’s Deposition Transcript from IPR2016-00219, an unrelated proceeding) to the extent it constitutes inadmissible hearsay under FRE 801-802 and because it lacks authentication under FRE 901.

Patent Owner further objects to Exhibit 1041 as irrelevant, confusing, and misleading, vague, ambiguous, and speculative under FRE 401, 402 and 403, and as incomplete under FRE 106 for failure to provide all related evidence.

Patent Owner further objects to Exhibit 1041 to the extent it mischaracterizes prior testimony or evidence, and/or assumes facts not in evidence.

Patent Owner further objects to Exhibit 1041 to the extent it is being used to improperly attempt to impeach a witness under FRE 613.

Patent Owner reserves the right to revise, modify, or assert additional or further objections.

Dated: May 21, 2021

Respectfully submitted,

/James J. Lukas, Jr./

James J. Lukas, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the below date, I caused the forgoing to be served by electronic mail to the following:

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Date: May 21, 2021

/James J. Lukas, Jr./