

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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NETFLIX, INC.,

Petitioner,

v.

AVAGO TECHNOLOGIES INTERNATIONAL SALES PTE. LIMITED,

Patent Owner.

Case No. IPR2020-01582

U.S. Patent No. 8,572,138

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**PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE  
PURSUANT TO 37 C.F.R. § 42.64(b)(1)**

Pursuant to 37 C.F.R. § 42.64(b)(1) and the Federal Rules of Evidence, Petitioner submits the following objections to evidence served by Patent Owner. These objections are timely served pursuant to 37 C.F.R. § 42.64(b)(1) within five business days of service of the evidence. The Federal Rules of Evidence (F.R.E.) apply to these proceedings according to 37 C.F.R. § 42.62(a), and these rules form the basis of the objections contained herein.

Document	Objections
Paper 24	<u>Timeliness.</u> F.R.E. 403; 37 C.F.R. § 42.23(b). Portions of Patent Owner’s Sur-Reply belatedly and improperly raise new issues and arguments that could have been raised in previous briefings. These portions include at least arguments on pages 21-24 of the Sur-Reply.

Date: November 15, 2021

Respectfully submitted,

/Harper Batts/

Harper Batts (Reg. No. 56,160)

Attorney for Petitioner

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 15, 2021, a complete copy of the foregoing document was served via email to all parties to this proceeding at the addresses indicated:

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