

**UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

UNIFIED PATENTS, LLC,  
Petitioner,

v.

VL COLLECTIVE IP LLC,  
Patent Owner

---

IPR2022-01086  
U.S. Patent 8,605,794

---

**PETITIONER'S OBJECTIONS UNDER 37 C.F.R. § 42.64(b) TO  
PATENT OWNER'S EVIDENCE SUBMITTED WITH  
PATENT OWNER RESPONSE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner respectfully submits the following objections to evidence filed by Patent Owner with its Patent Owner Response (Paper 20). These objections are timely as they are being made within five business days of the filing of the Patent Owner Response (April 17, 2023).

The following chart lists Petitioner's objections to the admissibility of evidence that was filed with the Patent Owner Response. The chart identifies the basis for those objections under the Federal Rules of Evidence (FRE).

Object to Exhibit	Basis for Objection
Exhibit 2010	<b>FRE 106:</b> Fairness requires consideration of the entirety of Exhibit 2010. With its Response, Patent Owner submitted Exhibit 2009 (Claim Construction Order) which indicates that “[t]he Court’s constructions are to be understood in light of the analysis and guidance provided during the Markman hearing [Exhibit 2010] held on December 16, 2022.” EX2009, 1. Patent Owner submitted only three pages of the Markman hearing transcript (EX2010, 110-112). The entirety of the Markman hearing transcript should be considered to provide context to the Claim Construction Order (EX2009).

Dated: April 24, 2023

Respectfully submitted,

/Raghav Bajaj/

Raghav Bajaj

Lead Counsel for Petitioner

Registration No. 66,630

HAYNES AND BOONE, LLP  
2323 Victory Avenue, Suite 700  
Dallas, Texas 75219

**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that a true and correct copy of the foregoing was served on the Patent Owner as detailed below:

*Date of service* April 24, 2023

*Manner of service* Electronic Mail to:  
[clehman@reichmanjorgensen.com](mailto:clehman@reichmanjorgensen.com);  
[mmatulewicz-crowley@reichmanjorgensen.com](mailto:mmatulewicz-crowley@reichmanjorgensen.com);  
[jcardenas-navia@reichmanjorgensen.com](mailto:jcardenas-navia@reichmanjorgensen.com);  
[RJ\\_VideoLabs-Netflix@reichmanjorgensen.com](mailto:RJ_VideoLabs-Netflix@reichmanjorgensen.com)

*Documents served* **Petitioner's Objections Under 37 C.F.R. § 42.64(b)  
To Patent Owner's Evidence Submitted With  
Patent Owner's Response**

*Persons Served* Christine E. Lehman  
REICHMAN JORGENSEN LEHMAN & FELDBERG LLP  
1909 K Street, NW, Suite 800  
Washington, DC 20006

Jaime F. Cardenas-Navia (pro hac vice)  
Michael Matulewicz-Crowley  
REICHMAN JORGENSEN LEHMAN & FELDBERG LLP  
400 Madison Avenue, Suite 14D  
New York, NY 10017

Respectfully submitted,

/Raghav Bajaj/  
Raghav Bajaj  
Lead Counsel for Petitioner  
Registration No. 66,630