UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COMCAST CABLE COMMUNICATIONS, LLC,
Petitioner,

v.

ENTROPIC COMMUNICATIONS, LLC,
Patent Owner.

Case IPR2025-00180
Patent 11,785,275

PATENT OWNER'S OBJECTIONS 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 ("FRE"), Patent Owner Entropic Communications, LLC hereby objects to the following documents submitted by Petitioner Comcast Cable Communications, LLC.

Nothing in this paper should be construed as an admission that any rights of Patent Owner would have been waived or forfeited had the paper or any objection herein not been filed, or that 37 C.F.R. § 42.64(b) applies to any of the objections herein if § 42.64(b) would not otherwise apply. The objections herein are premised upon § 42.64 potentially being determined to apply to the document in question, and are submitted solely to preserve the rights of Patent Owner should § 42.64(b) be determined to apply.

1. GENERAL OBJECTIONS

Patent Owner objects under FRE 401/402/403 to all references and documents that do not form the basis of the instituted review. Patent Owner further objects under FRE 602/701/801/802 and 37 C.F.R. § 42.61, as inadmissible hearsay to the extent Petitioner relies on any document for the truth of statements made therein.

2. EXHIBIT 1002, 1073

Under FRE 401/402/403/702, this document includes testimony not relevant to the instituted review, because, among other things, it has not been shown that the

purportedly expert declarant is qualified to testify competently regarding the matters the opinions are said to address, or that the declarant's testimony is based on sufficient facts or data or arrived at by reliable principles, procedures, or methods reliably applied to the facts of this case, or that the declarant's opinion will assist the trier of fact to understand the evidence or to determine any fact in issue and does not have a greater potential to mislead than to enlighten. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document includes testimony that is not shown to be based on first-hand knowledge including of how relied-upon data was generated, is based on speculation, and constitutes and contains inadmissible hearsay. Under FRE 401/705 and 37 C.F.R. § 42.65, this document includes testimony on patent law and practice.

3. EXHIBIT 1015, 1016, 1017, 1021, 1025, 1033, 1034, 1039, 1041, 1045, 1048, 1050

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this

document is inadmissible because it has not been shown to be authenticated or identified. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

4. EXHIBIT 1018

Under FRE 106/1001, 35 U.S.C. § 312(a)(3) & (5), and 37 C.F.R. § 42.51(b)(1), this document is incomplete and is not a copy which accurately reproduces the original. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified. The document is relied upon as evidence of prior art or of common knowledge or understanding of persons in the art at the priority date at issue, but is inadmissible because it has not been shown to qualify as prior art under, *inter alia*, 35 U.S.C. § 311(b), and there is a lack of supporting documentation to demonstrate common knowledge or understanding as of the priority date.

5. EXHIBIT 1019, 1035, 1036, 1037, 1038, 1042, 1043, 1044, 1046, 1049, 1051, 1075, 1076, 1079

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein.

6. EXHIBIT 1027

Under FRE 401/402/403, this document is inadmissible as irrelevant because, among other things, it does not form a basis of the instituted grounds, and its probative value is outweighed by other considerations including prejudice, confusion and waste of time. Under FRE 602/701/801/802 and 37 C.F.R. § 42.61, this document constitutes and contains inadmissible hearsay to the extent Petitioner relies on it for the truth of statements made therein. Under FRE 901, this document is inadmissible because it has not been shown to be authenticated or identified. Under FRE 401/705 and 37 C.F.R. § 42.65, this document does not disclose underlying facts and data.

Respectfully submitted,

/Parham Hendifar/

Parham Hendifar (Reg. No. 71,470)
LOWENSTEIN & WEATHERWAX LLP

Date: May 13, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following documents were served by electronic service, by agreement between the parties, on the date signed below:

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

The names and addresses of the parties being served are as follows:

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Respectfully submitted,

/ Kenneth Wang/

Date: May 13, 2025