

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JIAWEI TECHNOLOGY (HK) LTD., JIAWEI TECHNOLOGY (USA) LTD.,
SHENZHEN JIAWEI PHOTOVOLTAIC LIGHTING CO., LTD., ATICO
INTERNATIONAL (ASIA) LTD., ATICO INTERNATIONAL USA, INC.,
CHIEN LUEN INDUSTRIES CO., LTD., INC. (CHIEN LUEN FLORIDA),
CHIEN LUEN INDUSTRIES CO., LTD., INC. (CHIEN LUEN CHINA),
COLEMAN CABLE, LLC, NATURE'S MARK, RITE AID CORP., SMART
SOLAR, INC., AND TEST RITE PRODUCTS CORP.
Petitioner,

v.

SIMON NICHOLAS RICHMOND
Patent Owner.

Case IPR2014-00938
Patent 7,429,827

PETITIONER'S NOTICE OF OBJECTION TO EVIDENCE

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P.O. Box 1450
Alexandria, VA 22313-1450

PETITIONER'S NOTICE OF OBJECTION TO EVIDENCE for
Inter Partes Review of U.S. Patent No. 7,429,827
Case IPR2014-00938

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner, Jiawei Technology (HK) Ltd., Jiawei Technology (USA) Ltd., Shenzhen Jiawei Photovoltaic Lighting Co., Ltd., Atico International (Asia) Ltd., Atico International USA, Inc., Chien Luen Industries Co., Ltd., Inc. (Chien Luen Florida), Chien Luen Industries Co., Ltd., Inc. (Chien Luen China), Coleman Cable, LLC, Nature's Mark, Rite Aid Corp., Smart Solar, Inc., and Test Rite Products Corp. (collectively "Petitioner"), hereby submits its notice of objections to certain evidence that Patent Owner, Simon Nicholas Richmond ("Patent Owner"), submitted in connection with IPR2014-00938.

Testimony of Simon Nicholas Richmond

Petitioner objects to certain testimony of Simon Nicholas Richmond submitted as part of Exhibit 2063 (Declaration by Simon Nicholas Richmond). Specifically, Petitioner objects to paragraphs 10, 18, 20, 22, and 24 of Exhibit 2063 to the extent they include hearsay statements and/or to the extent Simon Nicholas Richmond offers factual observations without laying foundation or otherwise demonstrating personal knowledge (FRE 602, 702, 703, 801, and 802).

Paragraphs 10, 18, 20, 22, and 24 reference Exhibits 2042, 2050, 2052, 2054, and 2062 which are LinkedIn.com profiles that include hearsay statements as to the roles or job titles that are stated on such profiles. Additionally, one cannot adequately substantiate the information contained in the underlying exhibits.

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Exhibits

Petitioner objects to the following exhibits under FRE 801 and 802 as including hearsay statements as discussed above:

- Exhibit 2042 - Floyd W. Smith's LinkedIn profile
- Exhibit 2050 - Lisa Biggs' LinkedIn profile
- Exhibit 2052 - Kathy Jo Van's LinkedIn profile
- Exhibit 2054 - Multiple LinkedIn profiles
- Exhibit 2062 - Heather Foster's LinkedIn Profile

Petitioner reserves the right to move to exclude the noted testimony and exhibits.

Respectfully submitted,

DENTONS US LLP

Dated: July 8, 2015

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