

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. (SHIEN LUEN FLORIDA),
CHIEN LUEN INDUSTRIES CO., LTD., INC. (SHIEN 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 No. IPR2014-00938
Patent 7,429,827

**PETITIONER'S OBJECTION TO PATENT OWNER'S
DEMONSTRATIVES**

Introduction

Petitioner and patent owner met and conferred over objections to their respective demonstrative exhibits and were able to resolve many of their respective disputes. Based on these agreements, it is our understanding that patent owner will file corrected demonstratives on September 18, 2015. Petitioner will, likewise, file its corrected, previously-served demonstratives on September 18, 2015. However, patent owner and petitioner were unable to resolve certain issues relating to the substance of a few of patent owner's demonstratives. Petitioner, therefore, sets forth its objections below.

Objection #1

Slide 40 cites *Vitronics Corp. v. Conceptronic, Inc.*, 90 F.3d 1576, 1583-84 for a legal proposition for which it was not previously cited, and appears to be a new argument as the demonstrative slide contains no citation to the record.

Objection #2

Slide 45 cites *SRI Int'l v. Matsushita Elec. Corp.*, 775 F.2d 1107, 1118 (Fed. Cir. 1985), which appears to not have been previously cited by patent owner, moreover, the slide contains no cite to the record.

Objection #3

Petitioner objects to demonstrative exhibit 2066 because the slides/exhibit contains a video clip of petitioner's expert, Dr. Shackle's, deposition testimony,

which was not submitted as part of the record in these IPRs and thus is new and untimely evidence.

Conclusion

Petitioner believes it has resolved all of patent owner's objections and believe these are the only remaining objections. Petitioner is available from 10:00 a.m. EST to 12:00 p.m. EST, and after 3:00 p.m. EST on September 18, 2015 to discuss if necessary.

Respectfully submitted,

DENTONS US LLP

Dated: September 17, 2015

/Mark C. Nelson /

233 South Wacker Drive
Suite 7800
Chicago, IL 60606-6306

Mark C. Nelson
Reg. No. 43,830
Lissi Mojica
Reg. No. 63,421
Kevin Greenleaf
Reg. No. 64,062
Daniel Valenzuela
Reg. No. 69,027

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the PETITIONER’S OBJECTION TO PATENT OWNER'S DEMONSTRATIVES for *Inter Partes* Review of U.S. Patent No. 7,429,827 was served on the Counsel for the patent owner via email to the following email addresses:

tfshiells@shiellslaw.com

admin@shiellslaw.com

marcusb@tlpmb.com

Respectfully submitted,

Dated: __September 17, 2015____ _/Nona Durham/_____

Nona Durham