

Paper No. \_\_\_\_  
Filed: June 23, 2016

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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WANGS ALLIANCE CORPORATION d/b/a WAC LIGHTING CO.  
Petitioner

v.

PHILIPS LIGHTING NORTH AMERICA CORPORATION  
Patent Owner

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Case IPR2015-01294  
Patent 7,038,399

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**PATENT OWNER'S OBJECTIONS TO PETITIONER'S EXHIBITS**

Pursuant to 37 C.F.R. § 42.64(b)(1), Philips Lighting North America Corporation submits the following objections to certain exhibits submitted by Wangs Alliance Corporation d/b/a WAC Lighting Co. (“Petitioner”). Patent Owner’s objections apply equally to Petitioner’s reliance on these exhibits in any subsequently filed documents. These objections are timely, having been filed within five business days of service of the evidence to which the objections are directed.

**Exhibits 1018, 1020, 1021, 1022, 1023 and 1024**

Patent Owner objects to Exhibits 1018, 1020, 2021, 1022, 1023, and 1024 under Rules 401-403 of the Federal Rules of Evidence because the evidence in these exhibits lacks nexus to the grounds on which the Board has instituted *inter partes* review. Patent owner further objects because Petitioner never relied on the exhibits, explained with particularity where the subject matter of any of the challenged claims can be found in any of the exhibits, stated the relevance of the exhibits, and/or identified specific portions of the exhibits that support the challenges in the Petition.

**Exhibit 1019**

Patent Owner objects to Exhibit 1019 under Rule 702 of the Federal Rules of Evidence because opinions contained therein are conclusory and lack sufficient explanation. The opinions are not based on sufficient facts or data, and are not the

product of reliable principles and methods reliably applied to the facts of the case.

*See* 37 C.F.R. § 42.65.

Dated: June 23, 2016

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served on June 23, 2016, via email directed to counsel of record for the Petitioner at the following:

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