

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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GOOGLE INC.,

Petitioner,

v.

VEDANTI SYSTEMS LIMITED<sup>1</sup>

Patent Owner.

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Case No. IPR2016-00212<sup>2</sup>

Patent No. 7,974,339 B2

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**PATENT OWNER'S OBJECTIONS TO EVIDENCE PURSUANT TO 37  
C.F.R. § 42.64**

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<sup>1</sup> Vedanti Systems Limited has assigned the patent to the current patent owner, Vedanti Licensing Limited.

<sup>2</sup> Case IPR2016-00215 has been consolidated with this proceeding.

IPR2016-00212

Pursuant to 37 C.F.R. § 42.64(b)(1), the undersigned, on behalf of Patent Owner Vedanti Licensing Limited (“Patent Owner”) hereby submits the following objections to the admissibility of Exhibit 1030 submitted with Petitioner’s Reply on November 21, 2016.

Exhibit 1030 (“Supplemental Declaration of Dr. John R. Grindon”) is objected to under F.R.E. 702 (improper expert testimony) and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993). Dr. Grindon does not possess the requisite specialized knowledge to render opinions as to the understandings and abilities of a person of ordinary skill in the art at the time of the invention in view of the expanded standard including a sufficient knowledge of compression. Exhibit 1030 is further objected to under F.R.E. 702 as the testimony is not based on sufficient facts or data, is not the product of reliable principles and methods, and the principles and methods have not been reliably applied to the facts of the case. Exhibit 1030 is further objected to under F.R.E. 703 as the testimony is based on facts or data that an expert in this field would not reasonably rely on. Exhibit 1030 is further objected to under 37 C.F.R. § 42.65(a) for failing to identify with particularity the underlying facts and data on which the opinions are based.

Exhibit 1030 is further objected to under 37 C.F.R. §42.23(b) as improper reply evidence. Paragraphs 49-70 and 73 are objected to as improper reply evidence to the extent they belatedly present information that could have been

raised in the Petition.

These objections have been timely made within five business days from the date of service of the evidence to which they are directed.

Date: November 29, 2016

By: /Robert M. Asher/

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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner's Objections To Evidence Pursuant To 37 C.F.R. § 42.64 was served on November 29, 2016 by electronic mail (by prior agreement with the Petitioner) to the attorneys of record at:

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by transmitting the documents to the attorneys' email addresses at:

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