

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BLUEBIRD BIO, INC.
Petitioner

v.

SLOAN KETTERING INSTITUTE FOR CANCER RESEARCH,
Patent Owner

Case No. IPR2023-00074
Patent No. 8,058,061

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

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner submits the following objections to exhibits served by Patent Owner in Case No. IPR2023-00074. Petitioner's objections apply equally to Patent Owner's reliance on the exhibit in any subsequently-filed documents. These objections are timely, having been served within five business days of service of evidence. 37 C.F.R. § 42.64(b)(1).

Exhibit 2048

Petitioner objects to Exhibit 2048 under Rules 401, 402, and 403 of the Federal Rules of Evidence ("FRE") because it is not cited in the Patent Owner Response ("POR") and is thus not relevant to the positions laid out in the POR.

Exhibit 2049

Petitioner objects to Exhibit 2049 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Exhibit 2050

Petitioner objects to Exhibit 2050 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Exhibit 2051

Petitioner objects to Exhibit 2051 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out

in the POR. Petitioner further objects to Exhibit 2051 under FRE 602 and/or 901 for lack of foundation.

Exhibit 2056

Petitioner objects to Exhibit 2056 under FRE 602 and/or 901 for lack of foundation. Petitioner further objects to Exhibit 2056 to the extent it relies on any other exhibit that is objected to.

Exhibit 2057

Petitioner objects to Exhibit 2057 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Exhibit 2059

Petitioner objects to Exhibit 2059 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Exhibit 2060

Petitioner objects to Exhibit 2060 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Exhibit 2061

Petitioner objects to Exhibit 2061 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Exhibit 2062

Petitioner objects to Exhibit 2062 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Exhibit 2063

Petitioner objects to Exhibit 2063 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Exhibit 2066

Petitioner objects to Exhibit 2066 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Exhibit 2067

Petitioner objects to Exhibit 2067 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Exhibit 2069

Petitioner objects to Exhibit 2069 under FRE 106 because it is an incomplete writing. Petitioner further objects to Exhibit 2069 under FRE 802 because it contains out of court statements that Patent Owner relies on for their truth, thus constituting impermissible hearsay. Petitioner also objects to Exhibit 2069 under FRE 602 and/or 901 for lack of foundation.

Exhibit 2083

Petitioner objects to Exhibit 2083 under Rules 401, 402, and 403 of the FRE because it is not cited in the POR and is thus not relevant to the positions laid out in the POR.

Dated: August 8, 2023

Respectfully submitted,

/Naveen Modi/
Naveen Modi
Registration No. 46,224
Counsel for Petitioner

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