

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SYMRISE AG AND SYMRISE INC.

PETITIONER,

v.

INOLEX INVESTMENT CORPORATION,

PATENT OWNER.

IPR2023-01035
Patent 10,995,048

**PETITIONER'S IDENTIFICATION OF OBJECTED TO PORTIONS OF
PATENT OWNER'S REPLY**

The Board authorized Petitioner to file a one-page document identifying certain portions of the Patent Owner's Reply (Paper 25) ("Reply") that include new arguments or improperly incorporate arguments by reference. Ex. 3001. Below, Petitioner identifies these portions of the Reply and provides a brief explanation of why the Board should not consider them.

1. On Page 10 of the Reply, PO improperly incorporates Ex. 2010, ¶¶102-109. PO asserts that Dr. Taber "impermissibly relies on hindsight," but the basis for that assertion is found only in the incorporated portions from Ex. 2010.

2. On pages 10-11 of the Reply, PO improperly incorporates Ex. 2010, ¶¶111-116. PO asserts that the claimed temperature ranges are not found in Wright '451, but the basis for that assertion is found only in the incorporated portions of Ex. 2010.

3. On page 12 of the Reply, PO provides an argument regarding long-felt need and failure of others, citing Ex. 2010, ¶¶128-132. This is a new argument not previously raised. In addition, the basis for this argument is found only in the incorporated portions of Ex. 2010.

Date: August 30, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE UNDER 37 CFR §42.6(e)(4)

The undersigned hereby certifies that a copy of the accompanying Petitioner's Identification of Objected to Portions of Patent Owner's Reply, is being served on August 30, 2024, via email directed to the following email addresses provided in Patent Owner's mandatory notices:

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