

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JEISYS MEDICAL INC.,
Petitioner,

v.

SERENDIA, LLC
Patent Owner.

Case No. IPR2024-00386
U.S. Patent No. 9,480,836

PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE

As provided by 37 C.F.R. § 42.64(b)(1), Petitioner Jeisys Medical Inc. hereby submits the following objections to evidence submitted by Patent Owner Serendia, LLC during the preliminary proceedings in this matter. To the extent Patent Owner subsequently relies on any of the evidence addressed herein, the objections set forth below shall continue to apply. These objections are timely served and filed within ten business days of institution of *inter partes* review. 37 C.F.R. § 42.64(b)(1). Non-withstanding the objections set forth herein, Petitioner expressly reserves the right to rely on any evidence submitted by Patent Owner, including on the ground that such evidence constitutes a party admission.

Exhibit	Description	Objections
2003	Complainant's July 24, 2023 Supplemental Validity Contentions, In re Certain Dermatological Treatment Devices & Components Thereof, No. 337-TA-1356 (U.S.I.T.C. July 24, 2023) (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2005	Rebuttal Expert Report of Daniel W. van der Weide, dated August 28, 2023 (PROTECTIVE ORDER MATERIAL)	FRE 702, 703: Petitioner objects to Exhibit 2005 to the extent it contains improper expert testimony under FRE 702 and 703. Such testimony includes testimony based on conclusory statements and/or mischaracterizations of the patent, the state of/level of skill in the art, the cited prior art references, and/or any motivation to combine the

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		references. Objectionable testimony also includes that not based on sufficient facts or data and that ignores relevant facts or data, is irrelevant, is not based on a reliable foundation, constitutes conclusory opinion without sufficient support, and/or does not reliably apply the appropriate principles and methods to the facts of the case. <i>See also Daubert v. Merrell Dow Pharms, Inc.</i>, 509 U.S. 579 (1993). FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 401, 402: Petitioner objects to this exhibit to the extent it contains analysis or opinions that are not relevant and/or not relied upon by Patent Owner.
2006	Rebuttal Expert Report of David Goldberg, M.D., J.D., dated August 28, 2023 (PROTECTIVE ORDER MATERIAL)	FRE 702, 703: Petitioner objects to Exhibit 2006 to the extent it contains improper expert testimony under FRE 702 and 703. Such testimony includes testimony based on conclusory statements and/or mischaracterizations of the patent, the state of/level of skill in the art, the cited prior art references, and/or any motivation to combine the references. Objectionable testimony also includes that not based on sufficient facts or data and that ignores relevant facts or data, is irrelevant, is not based on a reliable

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		foundation, constitutes conclusory opinion without sufficient support, and/or does not reliably apply the appropriate principles and methods to the facts of the case. <i>See also Daubert v. Merrell Dow Pharms, Inc.</i>, 509 U.S. 579 (1993). FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 401, 402: Petitioner objects to this exhibit to the extent it contains analysis or opinions that are not relevant and/or not relied upon by Patent Owner.
2007	Deposition transcript of Jean Woloszko, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 14, 2023 (excerpt)	FRE 106, 403: Exhibit 2007 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2008	Deposition transcript of Jean Woloszko, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.),	FRE 106, 403: Exhibit 2008 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
	taken September 15, 2023 (excerpt)	to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2009	Deposition transcript of Daniel W. van der Weide, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken August 31, 2023 (excerpt)	FRE 106, 403: Exhibit 2009 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2010	Deposition transcript of Daniel W. van der Weide, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 1, 2023 (excerpt)	FRE 106, 403: Exhibit 2010 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2011	Deposition transcript of David J. Goldberg, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken September 15, 2023 (excerpt)	FRE 106, 403: Exhibit 2011 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2012	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held November 7, 2023 (Jean Woloszko testimony excerpts) (“Woloszko Hr’g Tr.”)	FRE 106, 403: Exhibit 2012 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
2013	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held December 12, 2023 (Daniel van der Weide testimony excerpts) (“VDW Hr’g Tr.”)	FRE 106, 403: Exhibit 2013 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2014	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held December 11, 2023 2023 (David Goldberg testimony excerpts) (“Goldberg Hr’g Tr.”)	FRE 106, 403: Exhibit 2014 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2015	Complainant’s Rebuttal Post-Hearing Brief, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Jan. 5, 2024) (PROTECTIVE ORDER	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time,

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
	MATERIAL)	or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2019	Respondents' Joint Reply Post-Hearing Brief, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. Jan. 5, 2024) (excerpts)	FRE 106, 403: Exhibit 2019 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time. FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. For example, this exhibit is cited in support of Patent Owner's argument for discretionary denial of the Petition, which has been rejected. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
2020	Response of Ilooda to the Complaint and Notice of Investigation, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. May 1, 2023)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. For example, this exhibit pertains to Ilooda, a party which is no longer part of this proceeding. Also, this exhibit is cited in support of Patent Owner's argument for discretionary denial of the Petition, which has been rejected.
2022	Letter from Merle W. Richman, CKR Law, to Justin S. Cohen, Thompson & Knight LLP, Cutera, dated March 20, 2018	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. For example, this exhibit pertains to Ilooda, a party which is no longer part of this proceeding. Also, this exhibit is cited in support of Patent Owner's argument for discretionary denial of the Petition, which has been rejected. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
2023	Letter from Keith K. Im, SynKloud Technologies, LLC, to Todd Tillemans, Cynosure, LLC, dated Nov. 29, 2021	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. For example, this exhibit is cited in support of Patent Owner's argument for discretionary denial of the Petition, which has been rejected. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2026	U.S. Patent No. 6,766,202 B2	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2027	U.S. Patent No. 9,095,358 B2	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
2028	U.S. Patent No. 8,012,153 B2	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2030	Declaration of Daniel W. van der Weide, dated April 23, 2024 ("VDW Decl.") (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)	FRE 702, 703: Petitioner objects to Exhibit 2030 to the extent it contains improper expert testimony under FRE 702 and 703. Such testimony includes testimony based on conclusory statements and/or mischaracterizations of the patent, the state of/level of skill in the art, the cited prior art references, and/or any motivation to combine the references. Objectionable testimony also includes that not based on sufficient facts or data and that ignores relevant facts or data, is irrelevant, is not based on a reliable foundation, constitutes conclusory opinion without sufficient support, and/or does not reliably apply the appropriate principles and methods to the facts of the case. <i>See also Daubert v. Merrell Dow Pharms, Inc.</i>, 509 U.S. 579 (1993). FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 401, 402: Petitioner objects to this exhibit to the extent it contains

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		analysis or opinions that are not relevant and/or not relied upon by Patent Owner.
2031	Declaration of David J. Goldberg, dated April 20, 2024 ("Goldberg Decl.") (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)	FRE 702, 703: Petitioner objects to Exhibit 2031 to the extent it contains improper expert testimony under FRE 702 and 703. Such testimony includes testimony based on conclusory statements and/or mischaracterizations of the patent, the state of/level of skill in the art, the cited prior art references, and/or any motivation to combine the references. Objectionable testimony also includes that not based on sufficient facts or data and that ignores relevant facts or data, is irrelevant, is not based on a reliable foundation, constitutes conclusory opinion without sufficient support, and/or does not reliably apply the appropriate principles and methods to the facts of the case. <i>See also Daubert v. Merrell Dow Pharms, Inc.</i>, 509 U.S. 579 (1993). FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 401, 402: Petitioner objects to this exhibit to the extent it contains analysis or opinions that are not relevant and/or not relied upon by Patent Owner.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
2033	Hearing transcript, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), held December 11, 2023 (Dany Bérubé testimony excerpts) (“Bérubé Hr’g. Tr.”)	FRE 106, 403: Exhibit 2033 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time.
2035	Deposition transcript of Jongju Na, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C.), taken July 24, 2023 (“Na Dep. Tr.”) (excerpts)	FRE 106, 403: Exhibit 2035 is an incomplete excerpt and excludes relevant evidence, causing unfair prejudice and/or confusion of the issues. Petitioner reserves the right to require the introduction into evidence of any other part of the original material excerpted, or any other statement, that in fairness ought to be considered at the same time.
2036	Letter from Long H. Chen-S, FDA, to Lisa Pritchard, Galvanize Therapeutics, dated June 17, 2022	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2037	Brochure: Sylfirm X Dual Wave RF Microneedling System (2022) (“Brochure”)	FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2038	ViOL Patent List (Dec. 1, 2023), https://violmedical.com/about/patent	FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self-authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2039	Sylfirm X video	FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self-authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		not falling under any objection. FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2040	Sylfirm X Video	FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self-authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2042	Kevin A. Wilson, Leading Regenerative Therapies Creating a Paradigm Shift in Aesthetic Medicine, Aesthetic Guide 3–9 (Mar./Apr. 2022)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2043	Sylfirm X Testimonials	FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2044	ViOL, Sylfirm X Clinical Paper Summary (updated Jan. 2022)	FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues,

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2045	S.B. Cho et al., In Vivo Skin Reactions from Pulsed-Type, Bipolar, Alternating Current Radiofrequency Treatment Using Invasive Noninsulated Electrodes, SKIN RSCH. TECH. 1–8 (2018) (“Cho Study”)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2046	You Jin Jung et al., Therapeutic Effects of a New Invasive Pulsed-Type Bipolar Radiofrequency for Facial Erythema Associated with Acne Vulgaris and Rosacea, J. COSM. LASER THERAPY 1–5 (2021) (“Jung Study”)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2047	Shaun Wootten et al., An Evaluation of Electrocoagulation and Thermal Diffusion Following Radiofrequency Microneedling Using an In Vivo Porcine Skin	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues,

Petitioner’s Objections to Patent Owner’s Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
	Model, J. COSM. DERM. 1–7 (2020) (“Wootten Study”)	causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2048	Yoram Harth et al., Depressed Acne Scars—Effective, Minimal Downtime Treatment with a Novel Smooth Motion Non-Insulated Microneedle Radiofrequency Technology, 4 J. COSM. DERM. SCIS. APPLS. 212 (2014) (“Harth Study”)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2049	U.S. Patent No. 9,510,899 B2 (“Manstein ’899”)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2050	U.S. Patent No. 6,770,071 B2 (“Woloszko ’071”)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues,

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2051	U.S. Patent Application Publication No. 2008/0082090 A1 ("Manstein 090")	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2052	Email exchanges between SynKloud and Jeisys, transmitted December 6, 2021 through January 20, 2022, and Certified English Translations thereof (PROTECTIVE ORDER MATERIAL)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. For example, this exhibit is cited in support of Patent Owner's argument for discretionary denial of the Petition, which has been rejected.
2053	Respondents' Notice of Prior Art, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. May 24, 2023) ("1356 Investigation NOPA")	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		inadmissible under Rule 403. For example, this exhibit is cited in support of Patent Owner's argument for discretionary denial of the Petition, which has been rejected.
2054	Complainant's Initial Validity Contentions, <i>In re Certain Dermatological Treatment Devices & Components Thereof</i> , No. 337-TA-1356 (U.S.I.T.C. June 16, 2023) (PROTECTIVE ORDER MATERIAL)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. For example, this exhibit is cited in support of Patent Owner's argument for discretionary denial of the Petition, which has been rejected.
2056	Hee Kyung Kim et al., Immediate and Late Effects of Pulse Widths and Cycles on Bipolar, and Gated Radiofrequency- Induced Reactions in In Vivo Rat Skin, 16 CLINICAL COSM. INVESTIGATIONAL DERM. 721 (2023)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2057	S. Tyler Hollmig & Basil M. Hantash, Radiofrequency in Cosmetic Dermatology, Recent & Future Developments, 24 COSM. DERM. 565 (2011)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time,

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2058	U.S. Patent No. 8,142,426 B2 ("Knopp '426")	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2061	Exclusive Distribution and License Agreement between ViOL Co., Ltd. and Serendia LLC, dated February 7, 2018 (PROTECTIVE ORDER MATERIAL)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.
2062	Presentation: Sylfirm X Clinical Training (2021) (PROTECTIVE ORDER MATERIAL)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2063	Sylfirm Video2	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2064	Transcript of Exhibit 2063 - Sylfirm Video2	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated,

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2065	Presentation: Koh Seikoh, <i>Skin Rejuvenation Treatment of Asian Skin Using Pulse Oscillation Needle RF</i> , 38TH ANN. MTG. JAP. SOC'Y AESTHETIC DERM. (Sept. 13, 2020) (PROTECTIVE ORDER MATERIAL)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating.
2066	Martin Braun, Sylfirm X Revolutionises [sic] the Clinical Applications of RF Microneedling, 12 PRIME INT'L J. AESTHETIC ANTI-AGEING [SIC] MED. 50 (2022)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
2067	World-Class Product of Korea 2020, Certificate to ViOL Co., Ltd., dated December 9, 2020 ("Sylfirm X Award")	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2069	Baze Mpinja, <i>A New Filler for Laugh Lines & More Procedures That Are Safe for Dark Skin</i> , ALLURE (Mar. 20, 2023), https://www.allure.com/story/inclusive-skin-procedures	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2071	Profit & Loss, January–December 2021 (Accrual Basis) (July 6, 2023, 2:31 PM) (PROTECTIVE ORDER MATERIAL)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time,

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2073	Christopher L. Brace et al., <i>Microwave Ablation with a Triaxial Antenna: Results in Ex Vivo Bovine Liver,</i>” 53 IEEE TRANSACTIONS MICROWAVE THEORY TECHS. 215 (2005)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2074	Dieter Haemmerich et al., Finite-Element Analysis of Hepatic Multiple Probe Radio-Frequency Ablation, 49 IEEE TRANSACTIONS BIOMED. ENG’G 836 (2002)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		not falling under any objection.
2075	Luca Zilberti, Charge Relaxation in Biological Tissues with Extremely High Permittivity, 7 IEEE MAGNETICS LETTERS 1 (2016)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2076	Int'l Electrotechnical Comm'n Int'l Standard, Medical Electrical Equipment - Part 2-2: Particular Requirements for the Basic Safety and Essential Performance of High Frequency Surgical Equipment and High Frequency Surgical Accessories (IEC 60601-2-2) (6.0 ed. Mar. 2017)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2077	Int'l Electrotechnical Comm'n Int'l Standard, Medical Electrical Equipment - Part 2-2: Particular Requirements for the Basic Safety and Essential Performance of High Frequency Surgical Equipment	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time,

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
	and High Frequency Surgical Accessories (IEC 60601-2-2:2009 Withdrawn) (5.0 ed. Feb. 2009)	or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2078	International Standard, Medical Electrical Equipment - Part 2-2: Particular Requirements for the Basic Safety and Essential Performance of High Frequency Surgical Equipment and High Frequency Surgical Accessories (IEC 60601-2-2:2009 Withdrawn), INT'L ELECTROTECHNICAL COMM'N WEBSTORE (5.0 ed.) (Feb. 23, 2009), https://webstore.iec.ch/publication/2624 (last visited Aug. 25, 2023) (Abstract only)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2079	Sylfirm X (product information), ViOL (2022), https://violmedical.com/for_providers/product?idx=10 (last visited Feb. 25, 2023)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self-authenticating. FRE 801, 802: Petitioner objects to

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		this exhibit as inadmissible hearsay not falling under any objection.
2083	ViOL, Sylfirm X User Manual (VO-UM-SFX-03), revised April 20, 2022	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2084	Sylfirm X, Device Description (PROTECTIVE ORDER MATERIAL)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		not falling under any objection.
2086	Sylfirm X Product Photographs	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2087	Presentation: D. van der Weide, RF Microneedle Arrays: Thermal Results, dated July 26, 2023	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 702, 703: This exhibit is not based on sufficient facts or data and it ignores relevant facts or data, is irrelevant, is not based on a reliable foundation, constitutes conclusory opinion without sufficient support,

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		and/or does not reliably apply the appropriate principles and methods to the facts of the case. <i>See also Daubert v. Merrell Dow Pharms, Inc.</i>, 509 U.S. 579 (1993). FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating.
2088	Photographs: Products at Issue Examinations (June–August 2023)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 702, 703: This exhibit is not based on sufficient facts or data and it ignores relevant facts or data, is irrelevant, is not based on a reliable foundation, constitutes conclusory opinion without sufficient support, and/or does not reliably apply the appropriate principles and methods to the facts of the case. <i>See also Daubert v. Merrell Dow Pharms, Inc.</i>, 509 U.S. 579 (1993). FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
2089	Cirtec Medical System Drawings, Project: AW000083_A GTW RF PCB, including Certificate of Translation (PROTECTIVE ORDER MATERIAL)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 602, 604, 901, 902: Petitioner objects to this exhibit to the extent it includes a translation not prepared by a qualified translator, and to the extent the exhibit offers testimony in areas outside the expertise of the translator(s) or otherwise fails to properly provide the underlying facts, data, or other required disclosures. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating
2090	ViOL, Sylfirm X RF Waveform, R&D (May 22, 2023) (PROTECTIVE ORDER MATERIAL)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2091	Product photograph (CX-3378C.1)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2092	Product photograph (CX-3379C.1)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2093	Product photograph (CX-3380C.1)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2094	Product photograph: Bi-Polar Electrodes, Consumable Tip	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		not falling under any objection.
2095	Jae Min Shin & Jeong Eun Kim, <i>Radiofrequency in Clinical Dermatology</i> , 2 MED. LASERS 49 (2013)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2096	Tae Hwan Ahn & Sung Bun Cho, <i>Invasive Pulse-Type, Bipolar, Alternating Current Radiofrequency Treatment Using Microneedle Electrodes for Nasal Rosacea</i> , 6 MED. LASER 32 (2017)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2097	Sylfirm X Introduction Video 1	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time,

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2098	Transcript of Exhibit 2097 - Sylfirm X Introduction Video 1	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2099	Sylfirm X Introduction Video 2	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2100	Transcript of Exhibit 2099 - Sylfirm X Introduction Video 2	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 901, 902: This exhibit lacks foundation, is not authenticated, and is not self- authenticating. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2101	Press Release, BENEV Co., Inc., BENEV Launches Sylfirm X Ultimate Edition, a Novel Radiofrequency Micro-needling Device, in the U.S. as the Exclusive Distributor (Apr. 26, 2021, 14:51 ET), https://www.prnewswire.com/news-releases/benev-launches-sylfirm-x-ultimate-edition-a-novel-radiofrequency-micro-needling-device-in-the-us-as-the-exclusive-distributor-301277036.html	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
2102	Presentation: Jiehoon Kim, ViOL / Sylfirm, <i>Pigmentary and Vascular Treatment with Pulsed RF "Sylfirm,"</i> including Certificate of Translation (PROTECTIVE ORDER MATERIAL)	FRE 402, 403: This exhibit is not relevant. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time, or needlessly presenting cumulative evidence, and therefore is inadmissible under Rule 403. FRE 602, 604, 901, 902: Petitioner objects to this exhibit to the extent it includes a translation not prepared by a qualified translator, and to the extent the exhibit offers testimony in areas outside the expertise of the translator(s) or otherwise fails to properly provide the underlying facts, data, or other required disclosures. FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection.
2139	Declaration of Vincent A. Thomas, dated April 23, 2024 ("Thomas Decl.") (PROTECTIVE ORDER MATERIAL AND REDACTED VERSIONS)	FRE 702, 703: Petitioner objects to Exhibit 2139 to the extent it contains improper expert testimony under FRE 702 and 703. Such testimony includes testimony based on conclusory statements and/or mischaracterizations of the patent, the state of/level of skill in the art, the cited prior art references, and/or any motivation to combine the references. Objectionable testimony also includes that not based on sufficient facts or data and

Petitioner's Objections to Patent Owner's Evidence
U.S. Patent No. 9,480,836 | IPR2024-00386

Exhibit	Description	Objections
		that ignores relevant facts or data, is irrelevant, is not based on a reliable foundation, constitutes conclusory opinion without sufficient support, and/or does not reliably apply the appropriate principles and methods to the facts of the case. <i>See also Daubert v. Merrell Dow Pharms, Inc.</i>, 509 U.S. 579 (1993). FRE 801, 802: Petitioner objects to this exhibit as inadmissible hearsay not falling under any objection. FRE 401, 402: Petitioner objects to this exhibit to the extent it contains analysis or opinions that are not relevant and/or not relied upon by Patent Owner.

Respectfully submitted,

Date: August 5, 2024

/s/ Wesley O. Mueller
Wesley O. Mueller (Reg. No. 33,976)
Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that a complete copy of this Petitioner's Objections to Patent Owner's Evidence was served via electronic email on Patent Owner's counsel of record listed below, pursuant to its January 26, 2024 Mandatory Notices, on August 5, 2024:

Charles H. Sanders
Latham & Watkins LLP
200 Clarendon Street
Boston, MA 02116
Phone: (617) 948-6000

Kevin C. Wheeler
Cecilia Peniza
Steven W. Peters
LATHAM & WATKINS LLP
555 11th St. NW, Suite 1000
Washington, D.C. 20004-1304
Phone: (202) 637-2200
kevin.wheeler@lw.com
cecilia.peniza@lw.com
steven.peters@lw.com

Date: August 5, 2024

/s/ Wesley O. Mueller
Wesley O. Mueller (Reg. No. 33,976)
Lead Counsel for Petitioner