UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NEURENT MEDICAL INC. & NEURENT MEDICAL LTD.

Petitioners,

v.

THE FOUNDRY, LLC,

Patent Owner.

Case No. IPR2024-00669

U.S. Patent No. 11,679,077

PETITIONERS' OBJECTIONS TO EVIDENCE UNDER 37 C.F.R. § 42.64

Pursuant to 37 C.F.R. § 42.64, Petitioners Neurent Medical Inc. and Neurent Medical Ltd. (collectively, "Neurent" or "Petitioners") submit the following objections to evidence served with Patent Owner's Sur-Reply on March 4, 2025. Petitioners' objections apply equally to Patent Owner's reliance on this evidence in any subsequently-filed documents. These objections are timely, having been filed within five business days of Patent Owner serving the evidence. *See* 37 C.F.R. § 42.64.

A. Exhibit 2011

Petitioners preserve and restate their objections to specific portions of Dr. BuSaba's cross-examination testimony taken during the deposition on February 21, 2025. To the extent Patent Owner has relied or will rely on portions of the testimony that were objected to during the deposition, Petitioners maintain those objections and the grounds for such objections. Petitioners also object to portions of the transcript on which Patent Owner relies that are subject to the errata appended to Exhibit 2011.

B. Exhibit 2012

Petitioners preserve and restate their objections to specific portions of Dr. Martin's cross-examination testimony taken during the deposition on February 20, 2025. To the extent Patent Owner has relied or will rely on portions of the testimony

that were objected to during the deposition, Petitioners maintain those objections and the grounds for such objections. Petitioners also object to portions of the transcript on which Patent Owner relies that are subject to the errata appended to Exhibit 2012.

Respectfully submitted,

By: /David L. Cavanaugh/
David L. Cavanaugh
Registration No. 36,476

Counsel for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that, on March 11, 2025, I caused a true and correct copy of the following materials:

- Petitioners' Objections to Evidence Under 37 C.F.R. § 42.64

to be served on Patent Owner via electronic mail to:

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