

Filed: February 20, 2025

Filed on behalf of: Aylo Freesites Ltd

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AYLO FREESITES LTD,
Petitioner

v.

WELLCOMEMAT, LLC,
Patent Owner

IPR2024-00710¹
U.S. Patent No. 8,307,286

**PETITIONER'S OBJECTIONS UNDER 37 C.F.R. § 42.64 TO EVIDENCE
SUBMITTED WITH PATENT OWNER RESPONSE**

¹ The Board administratively terminated related proceeding IPR2024-01101, consolidating it with IPR2024-00710. Paper 18.

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Aylo Freesites Ltd (“Petitioner”) objects to the admissibility of the following exhibits filed with Patent Owner WellcomeMat, LLC’s (“Patent Owner”) Response (Paper 24) on the grounds set forth below.

All objections herein under F.R.E. 802 (hearsay) apply to the extent Patent Owner relies on the exhibits identified in connection with that objection for the truth of the matter asserted therein.

Petitioner’s objections are as follows:

Exhibit	Objection ²
2018	F.R.E. 401/402 (lack of relevance), 403 (prejudice, confusing, waste of time).
2019	F.R.E. 401/402 (lack of relevance), 403 (prejudice, confusing, waste of time).
2020	F.R.E. 401/402 (lack of relevance), 403 (prejudice, confusing, waste of time).
2021	F.R.E. 401/402 (lack of relevance), 403 (prejudice, confusing, waste of time).

² “F.R.E.” herein refers to the Federal Rules of Evidence.

Exhibit	Objection ²
2022	F.R.E. 401/402 (lack of relevance), 403 (prejudice, confusing, waste of time), 602 (lack of foundation), 702/703 (insufficient facts or data, not the kinds of facts or data upon which an expert in the field would reasonably rely), 802 (hearsay), and 901 (authenticity of relied upon documents).
2023	F.R.E. 401/402 (lack of relevance), 403 (prejudice, confusing, waste of time), 602 (lack of foundation), 702/703 (insufficient facts or data, not the kinds of facts or data upon which an expert in the field would reasonably rely), 802 (hearsay), and 901 (authenticity of relied upon documents).
2028	F.R.E. 401/402 (lack of relevance), 403 (prejudice, confusing, waste of time), 602 (lack of foundation), 702/703 (insufficient facts or data, not the kinds of facts or data upon which an expert in the field would reasonably rely), 802 (hearsay), and 901 (authenticity of relied upon documents).
2041	F.R.E. 401/402 (lack of relevance), 403 (prejudice, confusing, waste of time), 601 (competency to testify), 602 (lack of foundation), 603 (oath or affirmation to testify truthfully), 702/703

Exhibit	Objection ²
	(insufficient facts or data, not the kinds of facts or data upon which an expert in the field would reasonably rely), 802 (hearsay), and 901 (authenticity of relied upon documents).
2042	F.R.E. 401/402 (lack of relevance), 403 (prejudice, confusing, waste of time).

DATED: February 20, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2025, I caused a true and correct copy of this Petitioner's Objections to Patent Owner's Evidence to be served via electronic service by email at the following addresses:

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DATED: February 20, 2025

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