

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DELTRAN USA LLC
Petitioner

v.

THE NOCO COMPANY
Patent Owner

Case IPR2024-01219[†]
Patent No. 11,667,203

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

[†] ADC Solutions Auto LLC was joined as a petitioner to this proceeding based on a petition and a motion for joinder in IPR2025-00885.

Pursuant to the Board's November 20, 2025 Order (Paper 21) Petitioner Deltran USA LLC ("Petitioner") provides the following objections to Patent Owner the NOCO Company's ("NOCO") Demonstrative Exhibits (Paper 23). These objections are timely filed pursuant to the Board's November 20, 2025 Order (Paper 21 at 4).

Specifically, Petitioner objects to the following:

- **Slides 6, 7, 16, 23, 26, 28, 31, 41, 45, 48:** Each of these slides includes arguments NOCO waived by not including them in its Patent Owner Response or Sur-Reply, namely that "The Petition Fails to Establish How to Combine Richardson and Zhao" and "The Petition Fails to Establish How to Combine Yu and Paparrizos."
- **Slide 39:** Petitioner objects to the entire slide which presents arguments NOCO waived by not including them in its Patent Owner Response or Sur-Reply, namely that "Zhao is a Step-Up Charger for Low Power Devices."
- **Slide 40:** Petitioner objects to the second and third statements on this slide stating arguments NOCO waived by not including them in its Patent Owner Response or Sur-Reply, namely that "A POSITA would not have considered the low-voltage, low-power charger of Zhao for jump starting vehicle batteries up to 48V" and "A POSITA would not have considered Zhao's system suitable for rapid recharging a high-capacity battery ('in about 1 to 5

minutes’))”

- **Sides 42-44:** Petitioner objects to these slides in their entirety as presenting arguments NOCO waived by not including them in its Patent Owner Response or Sur-Reply, namely that “The Petition Fails to Establish How to Combine Richardson and Zhao,” as stated in the heading of these slides.
- **Slide 49:** Petitioner objects to the entire slide as presenting arguments NOCO waived by not including them in its Patent Owner Response or Sur-Reply, namely that “The Petition Fails to Establish How to Combine Yu and Paparrizos.”

A copy of the objected-to slides is included herewith as Exhibit 1070.

Dated: December 16, 2025

Respectfully submitted

By: /Ryan N. Miller/
Ryan N. Miller
Reg. No. 68,262

Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e), I certify that on this 16th day of December, 2025, I served a copy of PETITIONER'S OBJECTIONS TO PATENT OWNER'S DEMONSTRATIVE EXHIBITS by electronic mail on Patent Owner's counsel, lead and back-up, and ADC's Counsel as follows:

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