

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PASCAL TECHNOLOGIES

Petitioner

v.

CAMBRIDGE ENTERPRISE LIMITED, UNIVERSITAT DE BARCELONA,
AND UNIVERSITAT POLITÈCNICA DE CATALUNYA,

Patent Owner

U.S. Patent No. 11,230,656
Inter Partes Review No. 2024-01235

**NOTICE OF PATENT OWNER OBJECTIONS TO
PETITIONER'S SUPPLEMENTAL EVIDENCE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Cambridge Enterprise Limited, Universitat De Barcelona, and Universitat Politècnica De Catalunya and exclusive licensee Barocal Ltd. (collectively “Patent Owner”) object as follows to the admissibility of evidence served by Petitioner Pascal Technologies with its Petition for *Inter Partes* Review in each case:

Exhibit	Objections
Supplemental Declaration of Sylvia Hall-Ellis, Ph.D. in Support of Petition for Inter Partes Review of U.S. Patent No. 11,230,656 (Served as Supplemental Evidence on Patent Owner on April 21, 2025)	FRE 402: Petitioner has not established, at the time of filing, that the Declaration supports a publicly accessibility date of Exs. 1006-1007, 1009, or 1021 before the filing date of the ’656 patent. Petitioner has not presented evidence with its Petition sufficient to satisfy its threshold burden of demonstrating that any reference constitutes a printed publication under 35. U.S.C. § 102. <i>See Hulu, LLC v. Sound View Innovations, LLC</i>, IPR2018-01039, Paper 29 (PTAB Dec. 20, 2019) (precedential). FRE 702/703 (Unreliable expert testimony): The exhibit contains statements and opinions that are not admissible under FRE 702 or 703. For example, the exhibit contains opinions for which the factual bases have not been disclosed, including numerous broad and/or conclusory statements made without analysis or sufficient citations to evidence or explanation. The exhibit contains generalizations based on methodology that is not widely accepted and/or has a high potential for error. Petitioner has not established that the expert is relying upon the type of facts or data reasonably relied upon in

	the field such that the opinion is admissible under FRE 703. FRE 802: To the extent it is being offered to prove the truth of the matter asserted, the exhibit constitutes inadmissible hearsay.
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Respectfully submitted,

Filed: April 28, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2025, I caused a true and correct copy of the foregoing NOTICE OF PATENT OWNER OBJECTIONS TO PETITIONER'S SUPPLEMENTAL EVIDENCE to be served electronically on Petitioner at the following email address:

Jeffrey Johnson
Steve Maule
Robert Benson
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By: /Justin L. Krieger/
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