

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GARMIN INTERNATIONAL, INC.,
Petitioner,

v.

SARIS EQUIPMENT, LLC,
Patent Owner,

IPR2024-01294
U.S. Patent No. 10,434,394

**PATENT OWNER SARIS EQUIPMENT, LLC'S
OBJECTIONS TO EVIDENCE UNDER 37 C.F.R. §42.64**

Pursuant to 37 C.F.R. §42.64(b)(1), Patent Owner Saris Equipment, LLC (“Patent Owner”) objects to the admissibility of the following exhibits filed on August 26, 2024 by Petitioner Garmin International, Inc. (“Petitioner”) with its Petition for *Inter Partes* Review. Pap. 1.

The Institution Decision issued on February 25, 2025. Pap. 5. Patent Owner’s objections are timely under 37 C.F.R. §42.64(b)(1). Patent Owners serves Petitioner with these objections to provide notice that Patent Owner may move to exclude the exhibits identified below as inadmissible.

1. Exhibits EX1010, EX1011 and EX1012

Patent Owner objects to the admissibility of EX1010, EX1011 and EX1012 for at least the following reasons:

Because EX1010, EX1011 and EX1012 are not cited or discussed in the Petition, they are not relevant under **FRE 401** (test for relevance) and are inadmissible under **FRE 402** (relevance) and **FRE 403** (probative value outweighed by prejudice, confusing of issues, wasting time).

2. Declaration of Alan Cote (Exhibit 1003)

Patent Owner objects to the Declaration of Alan Cote (Exhibit 1003) for at least the following reasons:

Under FRE 702 (expert testimony), Alan Cote’s opinions are inadmissible because they are conclusory, do not sufficiently disclose underlying facts or data in

support, and are unreliable. Additionally, under FRE 401 (test for relevance), FRE 402 (relevance), and FRE 403 (probative value outweighed by prejudice, confusing of issues, wasting time), his opinions are irrelevant, confusing, and of minimal probative value.

DATE: March 11, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2025, **PATENT OWNER SARIS EQUIPMENT, LLC'S OBJECTIONS TO EVIDENCE UNDER 37 C.F.R. §42.64** was served via email to counsel of record for Petitioner at the following addresses:

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