

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CMS CEP COR LTD., AND CMS CEP COR AMERICAS LLC
Petitioner,

v.

SANDVIK INTELLECTUAL PROPERTY AB
Patent Owner.

Patent No. 9,827,568

Inter Partes Review No. IPR2024-01380

PATENT OWNER'S OBJECTIONS TO DEMONSTRATIVES

Patent Owner hereby objects to the demonstrative exhibits submitted by Petitioner in the above-captioned proceeding. In accordance with the Board's Order Setting Oral Argument (Paper 36), these objections are being timely filed and served ahead of the hearing scheduled for January 13, 2026. Patent Owner has met and conferred with Petitioner, but the parties were unable to resolve the objections below.

Pursuant to Board's Order Setting Oral Argument (Paper 36), the objections "shall identify with particularity which portions of the demonstratives are subject to objection (and should include a copy of the objected-to portions) and include a one (1) sentence statement of the reason for each objection. No argument or further explanation is permitted." The following is an inclusion of the objected-to demonstratives, as well as an identification of the portions being objected to and a statement of the reason for each objection:

- **Slide 3**: Patent Owner objects to the third bullet point in Slide 3, because Petitioner is raising a new and unsupported argument on sur-reply that the field of endeavor is "main shaft assemblies for rock crushers."

Level of Skill & Field of Endeavor

- A person having ordinary skill in the art would be a person who has a bachelor's degree in mechanical engineering or a related field, and at least 2 years of experience with industrial equipment design and development. A POSITA may also have a combination of more formal education and less work experience or a combination of less/different formal education and more work experience. Ex. 1049, at ¶ 16.
- Patent Owner's Expert does not object to the above level of skill.
- Field of endeavor is main shaft assemblies for rock crushers. Paper 43, p. 3; Ex. 1001 at 1; Ex. 1016 at 1.



PETITIONERS' DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

EXHIBIT 1059 SLIDE 3

- **Slide 6:** Patent Owner objects to Slide 6, because Petitioner is raising new and unsupported arguments as to the problems to which the '568 Patent and Piepho are directed and the motivation to combine references.

Motivation

- Motivation to combine may be found explicitly or implicitly in market forces; design incentives; the 'interrelated teachings of multiple patents'; 'any need or problem known in the field of endeavor at the time of invention and addressed by the patent'; and the background knowledge, creativity, and common sense of the person of ordinary skill. (Paper 43, p. 9 – 10; MPEP 2143.01).
- A POSITA trying to increase the life of a main shaft, and/or reduce down time when performing maintenance on a main shaft assembly would be motivated to combine the straight shaft and wear sleeve of Torrence with the preferable tapered shaft and tapered sleeve of Piepho as tapered shafts improve the ease of removal and prevent damage to the shaft, they are able to be used in more locations as they do not require presses and gear pullers, and they make removing components on a tapered shaft particularly easy, particularly when combined with known hydraulic systems for making and breaking the interference fit. (Paper 43, p. 9 – 10; Ex. 1033 Behm, 1:13-15, 1:35-42; Ex. 1032 Sillett, 1:15-24; Ex. 1031 Harless, 3:15-22).



DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

EXHIBIT 1059 SLIDE 6

IPR2024-01380
Patent No. 9,827,568

Dated: January 12, 2026

Respectfully submitted,

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Counsel for Patent Owner

Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached PATENT OWNER'S OBJECTIONS TO
DEMONSTRATIVES was served as of the below date via e-mail (by agreement)
to the following counsel of record for Petitioner:

Terry M. Sanks
tsanks@firstiniplaw.com

Dated: January 12, 2026

/Mehran Arjomand/
Mehran Arjomand