

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. 11,014,090

Inter Partes Review No. IPR2024-01381

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Sandvik Intellectual Property AB (“Sandvik” or “Patent Owner”) hereby objects to the following evidence that was submitted by CMS Cepcor Ltd. and CMS Cepcor Americas LLC (collectively “CMS Cepcor” or “Petitioner”) with its Response to Patent Owner’s revised contingent Motion to Amend (“Response,” Paper 33) in the above- captioned proceeding. In accordance with 37 C.F.R. § 42.64(b)(1), these objections are being timely filed and served within five (5) business days of the service of the Response.

A. Exhibit 1051 – Smith 3rd Declaration

Patent Owner objects to Exhibit 1051 as irrelevant, lacking foundation, assuming facts not in evidence, calling for legal conclusions, and mischaracterizing evidence. Patent Owner further objects to Exhibit 1051 to the extent that it includes expert opinions for which the factual bases have not been disclosed, for which Mr. Smith does not have personal knowledge (Fed. R. Evid. (FRE) 602), and to the extent that Mr. Smith’s opinions constitute unreliable expert testimony under FRE 702 and 703.

Patent Owner objects to the portions of Exhibit 1051 not discussed or cited in the Response as not being relevant to the Response. If the objected to material was not discussed or cited in the Response, Patent Owner has had no fair opportunity to respond to Petitioner’s unstated contentions (if any) regarding the same. Such information is irrelevant, and its consideration would be unfairly

prejudicial to Patent Owner. Accordingly, at least those portions of Exhibit 1051 are objected to as not being relevant to any issue in this proceeding.

B. Exhibit 1052 – U.S. Patent No. 3,813,047 (Torrence)

Patent Owner objects to Exhibit 1052, as it was previously submitted as Exhibit 1012.

C. Exhibit 1054 - U.S. Patent No. 3,343,376 (Carman)

Patent Owner objects to Exhibit 1054, as it was previously submitted as Exhibit 1032.

D. Exhibit 1055 – Revised Claim Chart

Patent Owner objects to Exhibit 1055 as not a proper representation of the amendments made during this proceeding.

E. Exhibit 1056 - U.S. Patent No. 8,302,754 (Yagi)

Patent Owner objects to Exhibit 1056, as it was previously submitted as Exhibit 1040.

IPR2024-01381

Dated: December 3, 2025

Respectfully submitted,

By: /Mehran Arjomand/
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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 EVIDENCE was served as of the below date on the Petitioner via e-mail (by agreement) to the following counsel of record:

Terry M. Sanks
tsanks@firstiniplaw.com
litigation@firstiniplaw.com

Dated: December 3, 2025

/Mehran Arjomand/
Mehran Arjomand