

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QIAGEN SCIENCES, LLC,
Petitioner, v.

TECAN GENOMICS, INC.,
Patent Owner.

IPR2025-00026

U.S. Patents 11,098,357

**PETITIONER'S OBJECTIONS TO
ADMISSIBILITY OF EVIDENCE SUBMITTED BY PATENT OWNER**

Pursuant to 37 C.F.R. § 42.64(b) and the Federal Rules of Evidence (“FRE”), Petitioner QIAGEN Sciences, LLC (“QIAGEN”), hereby objects as follows to the admissibility of evidence filed by Patent Owner Tecan Genomics, Inc. in conjunction with the Patent Owner Responses, filed on August 20, 2025.

Exhibit	Objections
Ex.2001 - Can Alkan et al., <i>Limitations of next-generation genome sequence assembly</i> , 8 NAT. METHODS 61 (2011).	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2001 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
Ex.2002 - Mark J. P. Chaisson et al., <i>Genetic variation and the de novo assembly of human genomes</i> , 16 NAT. REV. 627 (2015).	<p>FRE 401 and 402: The exhibit is not cited in patent owner’s response, or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; see also <i>Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p>

	<p>FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.</p> <p>FRE 402 and 403: The exhibit is not prior art. Therefore, the exhibit's probative value with respect to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2002 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2003 - U.S. Patent Application Publication No. 2002/0145380</p>	<p>FRE 802: To the extent it is being offered to prove the truth of the</p>

	<p>matter asserted, This Exhibit constitutes inadmissible hearsay.</p> <p>FRE 106: The exhibit is incomplete and ought to be considered, in fairness, at the same time as the remainder of the file history of United States Patent Application Publication US2022/0145380A1.</p> <p>FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.</p> <p>FRE 402 and 403: The exhibit is not prior art. Therefore, the exhibit's probative value with respect to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a</p>
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	finding that the exhibit is what Patent Owner claims it is
Ex.2004 - Sara Goodwin et al., <i>Coming of Age: Ten Years of Next-Generation Sequencing Technologies</i> , 17 NAT. REV. 333 (2016).	<p>FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.</p> <p>FRE 402 and 403: The exhibit is not prior art. Therefore, the exhibit's probative value with respect to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2004 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>

<p>Ex.2005 - Takihiro Kanagawa, <i>Bias and Artifacts in Multitemplate Polymerase Chain Reactions (PCR)</i>, 96 J. BIOSCI. BIOENG. 317 (2003)</p>	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2005 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2006 - Lira Mamanova et al., <i>Target-Enrichment Strategies for Next-Generation Sequencing</i>, 7 NAT. METHODS 111 (2010).</p>	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2006 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2007 - Kensuke Nakamura et al., <i>Sequence-specific error profile of Illumina sequencers</i>, 39 NUCLEIC ACIDS RES. 90 (2011).</p>	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2007 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a</p>

	finding that the exhibit is what Patent Owner claims it is.
Ex.2008 - Frederick Sanger et al., <i>DNA sequencing with chain-terminating inhibitors</i> , 74 PROC. NAT'L. ACAD. SCI. USA 5463 (1977).	<p>FRE 401 and 402: The exhibit is not cited in patent owner's response, or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; see also <i>Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2008 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
Ex.2009 - Heena Satam et al., <i>Next-Generation Sequencing Technology: Current Trends and Advancements</i> , 12 BIOLOGY 997 (2023)	FRE 106: The exhibit is incomplete and ought to be considered, in fairness, at the same time as the published

	<p>correction, dated April 24, 2024.</p> <p>FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.</p> <p>FRE 402 and 403: The exhibit is not prior art. Therefore, the exhibit's probative value with respect to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2009 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
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<p>Ex.2010 - Nava Whiteford et al., <i>Swift: Primary Data Analysis for the Illumina Solexa Sequencing Platform</i>, 25 BIOINFORMATICS 2194 (2009).</p>	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2010 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2014 - Koon Ho Wong et al., <i>Multiplex Illumina Sequencing Using DNA Barcoding</i>, 101 CURR. PROTOC. MOL. BIO. 7.11.1 (2013).</p>	<p>FRE 106: The exhibit is incomplete and ought to be considered, in fairness, at the same time as the remainder of Current Protocols in Molecular Biology.</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2014 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2015 - Elaine R. Mardis, <i>DNA Sequencing Technologies: 2006-2016</i>, 12 NAT. PROTOC., 213 (2017).</p>	<p>FRE 401 and 402: The exhibit is not prior art and therefore is not</p>

	<p>relevant to any question of patentability.</p> <p>FRE 402 and 403: The exhibit is not prior art. Therefore, the exhibit's probative value with respect to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2015 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2016 - U.S. Patent No. 10,036,012</p>	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay.</p>

	<p>FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.</p> <p>FRE 402 and 403: The exhibit is not prior art. Therefore, the exhibit's probative value with respect to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p>
<p>Ex.2017 - U.S. Patent No. 9,564,399</p>	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay.</p> <p>FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.</p> <p>FRE 402 and 403: The exhibit is not prior art. Therefore, the exhibit's probative value with respect to any ground upon which trial was</p>

	instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.
Ex.2018 - U.S. Patent Application Publication No. 2012/0220494	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2018 constitutes inadmissible hearsay.</p> <p>FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.</p> <p>FRE 402 and 403: The exhibit is not prior art. Therefore, the exhibit's probative value with respect to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p>
Ex.2019 - T.A. Brown, <i>Genomes</i> (2d. ed. 2002), NAT'L CTR. FOR BIOTECHNOLOGY INFO., https://www.ncbi.nlm.nih.gov/books/NBK21129/ (last visited Feb. 19, 2025)	FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and

	<p>therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2019 constitutes inadmissible hearsay.</p> <p>QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.</p>
Ex.2020 - Unknown	<p>FRE 401 and 402: The exhibit is cited in patent owner's response, but patent owner did not list this exhibit in its exhibit list. Patent Owner also</p>

	<p>did not file, serve, or otherwise disclose a copy of this exhibit.</p> <p>Accordingly, the exhibit is not relevant to the proceeding.</p>
Ex.2021 - '399 Patent File History	FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay.
Ex.2040 —K. Mullis et al., Specific Enzymatic Amplification of DNA In Vitro: The Polymerase Chain Reaction, 51 Cold Spring Harbor Symposia Quantitative Biol. 1(1986)	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification</p>

	sufficient to support a finding that the exhibit is what Patent Owner claims it is.
Ex.2042 —Daniel Aird et al., Analyzing and minimizing PCR amplifications bias in Illumina sequencing libraries, 12 Genome Biol. (2011)	<p>FRE 401 and 402: The exhibit is not cited in the patent owner’s response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
Ex.2062 - Bringing Cost and Process Efficiency to Next Generation Sequencing, DRUG DISCOVERY WORLD, https://www.ddw-online.com/bringing-cost-and-processefficiency-to-next-generation-	FRE 401 and 402: The exhibit is not prior art and therefore is not

<p>sequencing-731-200908/ (last visited February 19, 2025)</p>	<p>relevant to any question of patentability.</p> <p>FRE 402 and 403: The exhibit is not prior art. Therefore, the exhibit's probative value with respect to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2062 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2075 - International Publication No. WO 2013/123442 A1 Bielas 2013</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated</p>

	<p>in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2107 – Declaration of Carlos D. Bustamante, Ph.D.</p>	<p>FRE 401 and 402: For each paragraph not cited in Patent Owner’s Response, the exhibit is not relevant to any ground upon which trial was instituted.</p> <p>FRE 106, 401, 402, and 403: The testimony offered in paragraphs 32-134 is misleading, incomplete, and irrelevant, including because the testimony</p>

	<p>offered lacks support, mischaracterizes the '357 patent, mischaracterizes the prior art, and addresses the patentability of subject matter that Patent Owner appears to have conceded is unpatentable based on the proceedings in IPR 2024-01502 and IPR 2024-01506.</p> <p>Therefore, the proffered testimony's probative value with respect to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence.</p> <p>FRE 702 and 703: The testimony offered in paragraphs 32-134 is not based on sufficient facts or data, the product of reliable principles and methods, and/or a reliable application of the principles and methods to the facts.</p> <p>Right to Cross-Examine: Petitioner reserves the</p>
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	right to cross-examine the declarant or else seek to exclude the exhibit as hearsay.
Ex.2108 – Transcript for the July 31, 2025 Deposition of Dr. Michael L. Metzker	<p>Petitioner hereby preserves and renews all objections made on the record during the July 31, 2025 Deposition of Michael L. Metzker.</p> <p>FRE 106: This exhibit may be an incomplete and/or inaccurate transcript of the July 31, 2025 deposition because the transcript does not include any forthcoming errata sheet. To the extent the witness submits an errata sheet, it must in fairness be considered at the same time as the exhibit.</p>
Ex.2153 - Gregory J. Porreca et al., Multiplex Amplification of Large Sets of Human Exons, 4 NATURE METHODS 931 (2007)	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2053 constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>

<p>Ex.2154 - Kircher et al., Double indexing overcomes inaccuracies in multiplex sequencing on the Illumina platform, NUCLEIC ACIDS RESEARCH 40:1 (2012)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2155 - Bronner et al., Improved Protocols for Illumina Sequencing, CURR PROTOC HUM GENET. (2009)</p>	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2055 constitutes inadmissible hearsay.</p>

	<p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2156 - Peter J. A. Cock et al., The Sanger FASTQ file format for sequences with quality scores, and the Solexa/Illumina FASTQ variants, 38 NUCLEIC ACIDS RES. 6 (2009)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>

<p>Ex.2157 - Aaron McKenna et al., The Genome Analysis Toolkit: A MapReduce framework for analyzing next-generation DNA sequencing data, 20 GENOME RES. 1297 (2010)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2158 - Hugo Y. K. Lam et al., Detecting and annotating genetic variations using the HugeSeq pipeline, 30 NAT.BIOTECH. 3 (2012)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and</p>

	<p>incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2159 - Paul Flicek & Ewan Birney, Sense from sequence reads: methods for alignment and assembly, 6 NAT. METHODS SUPPLEMENT 11 (2009)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p>

	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2160 - International Human Genome Sequencing Consortium, Finishing the euchromatic sequence of the human genome, 431 NAT. 21 (2004)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p>

	<p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2161 - Monya Baker, De novo genome assembly: what every biologist should know, 9 NAT. METHODS 4 (2012)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>

<p>2162 - Deanna M. Church et al., Modernizing Reference Genome Assemblies, 9 PLOS BIOL. 7 (2011)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2163 - David Stephen Horner et al., Bioinformatics approaches for genomics and post genomics applications of next generation sequencing, 11 BRIEFINGS IN BIOINFORMATICS 2 (2009)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and</p>

	<p>incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2164 - D. O. Antson et al., PCR-generated padlock probes detect single nucleotide variation in genomic DNA, 28 NUCLEIC ACIDS RES. 12 (2000)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p>

	<p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
<p>Ex.2181 - The Cost of Sequencing a Human Genome, NAT'L INST. OF HEALTH NAT'L HUMAN GENOME RESEARCH INST., https://www.genome.gov/aboutgenomics/fact-sheets/Sequencing-Human-Genome-cost (last visited July 11, 2025)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. § 42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p>

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<p>Ex.2182 - Coren A. Milbery et al., PCR-Based Methods for the Enrichment of Minority Alleles and Mutations, 55 CLIN. CHEM.. 632 (2009)</p>	<p>FRE 401 and 402: The exhibit is not cited in the patent owner's response or any other paper and therefore is not relevant. Exhibits and arguments that are not incorporated in papers are waived and incorporation by reference is strictly prohibited. 37 C.F.R. §</p>

	<p>42.6(a)(3); 37 C.F.R. § 42.22; <i>see also Parus Holdings, Inc. v. Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023).</p> <p>FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this exhibit constitutes inadmissible hearsay.</p> <p>FRE 901: Patent Owner has not produced evidence or certification sufficient to support a finding that the exhibit is what Patent Owner claims it is.</p>
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DATED: August 27, 2025

Respectfully submitted,

By /Matthew A. Traupman/
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 27, 2025, I caused a true and correct copy of the foregoing PETITIONER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE SUBMITTED BY PATENT OWNER to be served on counsel for Patent Owner via email at:

Timothy J. Beavers	tbeavers@goodwinlaw.com
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