

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QIAGEN SCIENCES, LLC,
Petitioner, v.

TECAN GENOMICS, INC.,
Patent Owner.

IPR2025-00028
IPR2025-00029

U.S. Patents 10,036,012 and 10,876,108

**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 Preliminary Responses, filed on February 19, 2025.

Exhibit	Objections
Ex. 2001 - <i>Affymetrix® Genome-Wide Human SNP Array 6.0</i> , Affymetrix, Inc. (2007).	FRE 401 and 402: The exhibit is not cited in petitioner’s preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.

Ex. 2002 - *Introduction to Affymetrix Microarrays*, GENSTAT, <https://genstat.kb.vsni.co.uk/knowledge-base/affymetrix-introduction/> (last visited February 19, 2025)

FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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 Parus Holdings, Inc. v. Google LLC*, 70 F.4th 1365, 1371 (Fed. Cir. 2023).

FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay.

FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.

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.

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.

	QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2003 - <i>Microarray Affymetrix Chips</i> , GENSTAT, https://genstat.kb.vsni.co.uk/knowledge-base/affymetrix-chips/ (last visited February 19, 2025).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability. 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. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2004 - Dennise D. Dalma-Weiszhausz et al., <i>The Affymetrix GeneChip® Platform: An Overview</i>, 410 METHODS IN ENZYMOLOGY 3 (2006).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2004 constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2005 - Mark F. Evans, <i>The Polymerase Chain Reaction and Pathology Practice</i>, 15 DIAGNOSTIC HISTOPATHOLOGY 344 (2009).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2005 constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2006 - <i>The Cost of Sequencing a Human Genome</i>, NATIONAL HUMAN GENOME RESEARCH INSTITUTE, https://www.genome.gov/about-genomics/fact-sheets/Sequencing-Human-Genome-cost (last visited February 19, 2025).	FRE 401 and 402: The exhibit is not cited in petitioner’s preliminary 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). FRE 106: The exhibit is incomplete and ought to be considered, in fairness, at the same time as the remainder of the source from which it originates.

	FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability. 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. FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2006 constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2007 - Sara Goodwin et al., <i>Coming of Age: Ten Years of Next-Generation Sequencing Technologies</i>, 17 NAT. REV. 333 (2016).	FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability. 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. FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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.
Ex. 2008 - Elaine R. Mardis, <i>DNA Sequencing Technologies: 2006-2016</i>, 12 NAT. PROTOC., 213 (2017).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). 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. FRE 802: To the extent it is being offered to prove the truth of the matter

	asserted, Exhibit 2008 constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2009 - <i>Bringing Cost and Process Efficiency to Next Generation Sequencing</i>, DRUG DISCOVERY WORLD, https://www.ddw-online.com/bringing-cost-and-process-efficiency-to-next-generation-sequencing-731-200908/ (last visited February 19, 2025)	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.

	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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2010 - Coren A. Milbery et al., <i>PCR-Based Methods for the Enrichment of Minority Alleles and Mutations</i>, 55 CLIN. CHEM. 632 (2009).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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.

	QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2011 - Lira Mamanova et al., <i>Target-Enrichment Strategies for Next-Generation Sequencing</i> , 7 NAT. METHODS 111 (2010).	FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2011 constitutes inadmissible hearsay. 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. FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2012 - Todd J. Treangen et al., <i>Repetitive DNA and Next-Generation Sequencing: Computational Challenges and Solutions</i> , 13 NAT. REV. 36 (2012).	FRE 106: The exhibit is incomplete and ought to be considered, in fairness, at the same time as the published correction, dated January 17, 2012. FRE 802: To the extent it is being offered to prove the truth of the matter

	asserted, Exhibit 2012 constitutes inadmissible hearsay. 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. FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability. 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. FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
--	--

Ex. 2013 - Shadi Shokralla et al., *Next-Generation Sequencing Technologies for Environmental DNA Research*, 21 Mol. ECOL. 1794 (2012).

FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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 Parus Holdings, Inc. v. Google LLC*, 70 F.4th 1365, 1371 (Fed. Cir. 2023).

FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.

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.

FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay.

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.

	QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2014 - QIAGEN® <i>Multiplex PCR Handbook</i>, QIAGEN (2010).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2015 - Sangjo Han et al., <i>AtRTPrimer: Database for Arabidopsis Genome-Wide Homogeneous and Specific RT-PCR Primer-Pairs</i>, 7 BMC BIOINFORMATICS 179 (2006).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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.</i>

	<i>Google LLC</i>, 70 F.4th 1365, 1371 (Fed. Cir. 2023). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2016 - Mikhail V. Matz et al., <i>Amplification of cDNA Ends Based on Template-Switching Effect and Step-out PCR</i>, 27 NUCLEIC ACIDS RES. 1558 (1999).	FRE 401 and 402: The exhibit is not cited in petitioner’s preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2017 - D. Bru et al., <i>Quantification of the Detrimental Effect of a Single Primer-Template Mismatch by Real-Time PCR Using the 16S rRNA Gene as an Example</i>, 74 APPL. ENVIRON. MICROBIOL. 1660 (2008).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2018 - Stephen A. Bustin et al., <i>Quantitative Real-time RT-PCR – A Perspective</i>, 34 J. MOL. ENDOCRINOL. 597 (2005).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2019 - Eric J. Duncavage et al., <i>Hybrid Capture and Next-Generation Sequencing Identify Viral Integration Sites from Formalin-Fixed, Paraffin-Embedded Tissue</i>, 13 J. MOL. DIAGNOSTICS. 325 (2011).	FRE 401 and 402: The exhibit is not cited in petitioner’s preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter

	asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2020 - Jannine Brownie et al., <i>The Elimination of Primer-Dimer Accumulation in PCR</i>, 25 J. NUCLEIC ACIDS RES. 3235 (1997).	FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2012 constitutes inadmissible hearsay. FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. 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.
Ex. 2021 - Florian Mertes et al., <i>Targeted Enrichment of Genomic DNA Regions for Next-Generation Sequencing</i>, 10 BRIEF. FUNCT. GENOM. 374 (2011).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2022 - Zhiyong Shen et al., MPrimer: <i>A Program for Reliable Multiplex PCR Primer Design</i>, 11 BMC BIOINFORMATICS FUNCT. GENOM. 143 (2010).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay.

	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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2023 - Ulla Deutsch et al., <i>Streamlining Multiplex PCR Analysis</i>, GENETIC ENGINEERING & BIOTECHNOLOGY, Dec. 1, 2011, https://www.genengnews.com/insights/streamlining-multiplex-pcr-analysis/.	FRE 401 and 402: The exhibit is not cited in petitioner’s preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.

Ex. 2024 - Ryan Tewhey et al., <i>Microdroplet-based PCR Enrichment for Large-Scale Targeted Sequencing</i>, 27 NAT. BIOTECHOL. 1025 (2009).	FRE 802: To the extent it is being offered to prove the truth of the matter asserted, Exhibit 2024 constitutes inadmissible hearsay. FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. 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.
Ex. 2025 - Prosecution History of U.S. Patent Application No. 13/750,768	FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. FRE 702, 703, and 705: To the extent Tecan relies on the Declaration of Dr. Andrew Brooks, it is inadmissible expert evidence. The testimony 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. Further, Dr. Brooks is not available for cross-examination. 37 C.F.R. § 42.65: Patent Owner objects to any reliance on the Declaration of Andrew Brooks as improper expert testimony under 37 C.F.R. § 42.65.
Ex. 2026 - Prosecution History of U.S. Patent Application No. 15/471,785	FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. FRE 702, 703, and 705: To the extent Tecan relies on the Declaration of Dr. Andrew Brooks, it is inadmissible expert evidence. The testimony 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. Further, Dr. Brooks is not available for cross-examination. 37 C.F.R. § 42.65: Patent Owner objects to any reliance on the Declaration of Andrew Brooks as improper expert testimony under 37 C.F.R. § 42.65.

Ex. 2027 - Prosecution History of U.S. Patent Application No. 16/017,340	FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. FRE 702 and 703: To the extent Tecan relies on the Declaration of Dr. Andrew Brooks, it is inadmissible expert evidence. The testimony 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. Further, Dr. Brooks is not available for cross-examination and relies on exhibits that are not admissible as described herein. 37 C.F.R. § 42.65: Patent Owner objects to any reliance on the Declaration of Andrew Brooks as improper expert testimony under 37 C.F.R. § 42.65.
Ex. 2028 - Declaration of Carlos D. Bustamente, Ph.D.	FRE 401, 402, and 403: To the extent that the declaration relies on exhibits not available by the priority date or not cited in the substantive paper of Patent Owner, as described herein. The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. FRE 702 and 703: The testimony offered in paragraphs 31–179 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. Dr. Bustamante further relies on exhibits that cannot be considered as evidence for the reasons described herein. 37 C.F.R. § 42.65: Patent Owner objects to this exhibit as improper expert testimony under 37 C.F.R. § 42.65. Right to Cross-Examine: Petitioner reserves the right to cross-examine the
--	---

	declarant or else seek to exclude the exhibit as hearsay.
Ex. 2029 - Ken Garber, <i>Fixing the Front End</i> , 26 NAT. BIOTECHNOL. 1101 (2008).	FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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.
Ex. 2030 - <i>TruSeq® DNA Library Prep Kits</i> , Illumina, Inc. (2014).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability.

	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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2031 - Hajime Matsuzaki et al., <i>Parallel Genotyping of Over 10,000 SNPs Using a One-Primer Assay on a High-Density Oligonucleotide Array</i>, 14 GENOME RES. 414 (2004).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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.

	QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2032 - Clay Risen, <i>Andrew Brooks, Who Developed a Rapid Covid Test, Dies at 51</i> , N.Y. TIMES, Jan. 31, 2021, https://www.nytimes.com/2021/01/31/science/andrew-brooks-dead.html .	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 401 and 402: The exhibit is not prior art and therefore is not relevant to any question of patentability. 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. FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2033 - <i>GeneChip® Human Mapping 10K Array and Assay Kit</i>, Affymetrix, Inc. (2003).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2034 - <i>Chipping out Our Differences</i>, 449 NATURE 629 (2007).	FRE 401 and 402: The exhibit is not cited in petitioner's preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay. 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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
Ex. 2035 - Giulia C. Kennedy et al., <i>Large-Scale Genotyping of Complex DNA</i>, 421 NAT. BIOTECHNOLOGY 1233 (2003).	FRE 401 and 402: The exhibit is not cited in petitioner’s preliminary 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). FRE 802: To the extent it is being offered to prove the truth of the matter asserted, this Exhibit constitutes inadmissible hearsay.

IPR2025-00026 (U.S. Patent No. 11,098,357)

IPR2025-00027 (U.S. Patent No. 11,725,241)

	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. QIAGEN reserves the right to raise additional objections if Tecan cites this Exhibit in subsequent papers.
--	--

DATED: May 28, 2025

Respectfully submitted,

By /Matthew A. Traupman/

Matthew A. Traupman (Reg. No. 50,832)

matthewtraupman@quinnemanuel.com

QUINN EMANUEL URQUHART

& SULLIVAN LLP

295 Fifth Avenue

New York, NY 10016

Tel: (212) 849-7000

Fax: (212) 849-7100

*Attorneys for Petitioner QIAGEN Sciences,
LLC*

IPR2025-00026 (U.S. Patent No. 11,098,357)

IPR2025-00027 (U.S. Patent No. 11,725,241)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 28, 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
Linnea P. Cipriano	lcipriano@goodwinlaw.com
John P. Padro	jpadro@goodwinlaw.com
Scott T. Weingaertner	sweingaertner@goodwinlaw.com

DATED: May 28, 2025

/Matthew A. Traupman/
Matthew A. Traupman (Reg. No. 50,832)
matthewtraupman@quinnemanuel.com
QUINN EMANUEL URQUHART
& SULLIVAN LLP
295 Fifth Avenue
New York, NY 10016
Tel: (212) 849-7000
Fax: (212) 849-7100

*Attorneys for Petitioner QIAGEN Sciences,
LLC*