UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

American Axle & Manufacturing, Inc.
Petitioner,

v.

Neapco Components, LLC,
Patent Owner

IPR2025-00091
U.S. Patent 11,598,376

PETITIONER'S OBJECTIONS TO
PATENT OWNER'S PRELIMINARY EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner submits the following objections to Patent Owner's Exhibit Nos. 2001–2003. Petitioner's objections apply equally to Patent Owner's reliance on these exhibits in any subsequently filed documents. These objections are timely, having been served within ten business days of the Board's decision to institute a trial in this proceeding. *See* Paper 7 (May 29, 2025).

Exhibit 2001

Exhibit 2001 is purportedly a screenshot of Stellantis' Independent Contractor Operator Portal Webpage.

Petitioner objects to Exhibit 2001 under FED. R. EVID. 401–403 as lacking nexus to the grounds on which the Board has instituted *inter partes* review. Exhibit 2001 does not make any fact more or less probable, and is unfairly prejudicial, confuses the issues, misleads the factfinder, and is a waste of time.

Petitioner objects to Exhibit 2001 under FED. R. EVID. 802. To the extent that Patent Owner relies on the contents of this Exhibit for the truth of the matter asserted, Petitioner objects to the contents as inadmissible hearsay (see Rule 801) that does not fall under any exceptions, including those of Rules 803, 804, 805, and 807.

Petitioner objects to Exhibit 2001 under FED. R. EVID. 901–902 as not being properly authenticated.

Exhibit 2002

Exhibit 2002 is purportedly a screenshot of Stellantis' Terms and Conditions Webpage.

Petitioner objects to Exhibit 2002 under FED. R. EVID. 401–403 as lacking nexus to the grounds on which the Board has instituted *inter partes* review. Exhibit 2002 does not make any fact more or less probable, and is unfairly prejudicial, confuses the issues, misleads the factfinder, and is a waste of time.

Petitioner objects to Exhibit 2002 under FED. R. EVID. 802. To the extent that Patent Owner relies on the contents of this Exhibit for the truth of the matter asserted, Petitioner objects to the contents as inadmissible hearsay (see Rule 801) that does not fall under any exceptions, including those of Rules 803, 804, 805, and 807.

Petitioner objects to Exhibit 2002 under FED. R. EVID. 901–902 as not being properly authenticated.

Exhibit 2003

Exhibit 2003 is purportedly a declaration of David J. Thomas in opposition to the petition for *Inter Partes Review* of the '376 patent.

Petitioner objects to Exhibit 2003 under FED. R. EVID. 401–403 as lacking nexus to the grounds on which the Board has instituted *inter partes* review. Exhibit 2003 does not make any fact more or less probable, and is unfairly prejudicial, confuses the issues, misleads the factfinder, and is a waste of time.

Petitioner objects to Exhibit 2003 under FED. R. EVID. 602 at least because the witness lacks personal knowledge of the subject matter of his testimony.

Petitioner objects to Exhibit 2003 under FED. R. EVID. 802. To the extent that Patent Owner relies on the contents of this Exhibit for the truth of the matter asserted, Petitioner objects to the contents as inadmissible hearsay (see Rule 801) that does not fall under any exceptions, including those of Rules 803, 804, 805, and 807.

Respectfully submitted,

Date: June 12, 2025

/ James R. Nuttall, Reg. No. 44,978/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing PETITIONER'S OBJECTIONS TO PATENT OWNER'S PRELIMINARY EVIDENCE was served on June 12, 2025, by filing this document through the P-TACTS platform as well as by delivering a copy via the delivery method indicated to the attorneys of record for the Petitioner as follows:

Via Email:

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