

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SINCLAIR PHARMA LIMITED, SINCLAIR PHARMA US, INC., VIORA,
INC., EMA AESTHETICS, LTD., AND AESTHETIC MANAGEMENT
PARTNERS, LLC AND AESTHETIC MANAGEMENT PARTNERS, INC.,
Petitioner,

v.

HYDRAFACIAL LLC,
Patent Owner.

Case No. IPR2025-00145
Patent No. 11,865,287

PETITIONERS' SECOND OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner provides the following objection to evidence submitted with Patent Owner's Response in the instant proceeding. The deficient/objectable nature of the earlier submitted evidence was only discovered during cross-examination of Patent Owner's expert Dr. Seth. As such, this objection is timely as served within five business days of the cross-examination that elicited the aforementioned discoveries to which the objection is directed.

I. EXHIBIT 2003

Petitioner objects to EX2003 ¶¶1-39, the entire Expert Declaration of Pallavi Seth, Ph.D., as inadmissible under Fed. R. Evid. 702 and constituting improper expert testimony. As made clear during the November 3, 2025 cross-examination, Dr. Seth disclosed that her opinions were based upon insufficient facts or data, and subject to unreliable methods. Moreover, cross-examination confirmed the absence of relevant expertise in the relevant field of this proceeding, and Dr. Seth did not consult with anyone else possessing such expertise in order to form the opinions included as evidence in EX2003.

Respectfully submitted,

Date: November 7, 2025

/Scott A. McKeown/

Scott A. McKeown, Reg. No. 42,866
WOLF, GREENFIELD & SACKS, P.C.

Counsel for Petitioners

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on November 7, 2025, a copy of the foregoing document, including any exhibits filed therewith, is being served via electronic mail, as previously consented to by Patent Owner, upon the following:

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Date: November 7, 2025

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