UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IMPERATIVE CARE, INC.,
Petitioner,

v.

INARI MEDICAL, INC.,
Patent Owner.

Case IPR2025-00156
Patent No. 11,697,012 B2

PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE UNDER 37 C.F.R. § 42.64(b)(1)

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner submits the following objections to Exhibit Nos. 1019, 1020, and 1021 filed by Petitioner, Imperative Care, Inc., with its Petitioner's reply to Patent Owner's response. Patent Owner's objections apply equally to Petitioner's reliance on these exhibits in its Reply or any subsequently-filed documents regarding same. These objections are timely, having been served within five (5) business days of service of evidence to which these objections are directed.

Exhibit 1020

Patent Owner objects to Exhibit 1020 ("Supplemental Declaration of Troy L. Thornton in Support of Petitioner's Reply for Inter Partes Review of U.S. Patent No. 11,697,011") under FRE 702 because the testimony is not based upon sufficient facts or data and is not the result of application of reliable principles and methods. Patent Owner further objects under FRE 703 that the facts or data are not of a type reasonably relied upon by experts. Patent Owner objects to Exhibit 1014 in its entirety and also specifically objects to Exhibit 1014, paragraphs 9, 13, 14, 16, 18, 19, 21, 26, 27, 31-35, 38, 39, 41, 43-45, 48, and 49 as relying upon incorrect interpretation of the challenged claims (including for the claim terms or phrases "filament," "the filament comprising a first portion extending around at least a portion of the tubular member and a second portion having a first end extending

from the first portion in one direction and a second end extending from the first portion in another direction," and "circumferentially constricts"), an incomplete and incorrect understanding and interpretation of Exhibit 1005 with respect to the configuration and operation of embodiments disclosed in Figures 12–19, 30–34 and accompanying text by, for example relying on a different document (Exhibit No. 1008) as if it is included in the disclosure of Exhbiti No. 1005, because the opinions contained therein are from the incorrect perspective of a person of ordinary skill in the art, and because Exhibit No. 1020 relates to a different patent and the claims contained therein (US11,697,011) and thus is not relevant to issues in this IPR. As such, Exhibit No. 1020 is not based upon sufficient facts or data, is not the result of application of reliable principles and methods, and the facts or data are not of a type reasonably relied upon by experts.

In view of the above deficiencies, Patent Owner further objects to Exhibit 1020 as creating unfair prejudice, confusing the issues, or as a waste of time pursuant to FRE 403 and as not being relevant and therefore being inadmissible under FRE 401 and 402.

Patent Owner further objects to Exhibit 1020 to the extent that any paragraph relies upon an exhibit that is objected to for the reasons set forth in those objections. Any paragraph in Exhibit 1020 that relies upon any exhibit not relied upon by the

PTAB to institute this proceeding is further objected to as not being relevant and therefore being inadmissible under FRE 401 and 402.

Exhibits 1019 and 1021

Patent Owner incorporates by reference all real-time objections made by Patent Owner's counsel during the depositions of Patent Owner's expert, Paul Zalesky, as reflected in the deposition transcripts (Exhibits Nos. 1019 and 1021).

In view of the foregoing objections, Patent Owner likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit Nos. 1019, 1020, and 1021. Furthermore, Patent Owner objects to paragraphs in the Reply that rely on the exhibits objected to in this Patent Owner's Objections to Petitioner's Evidence.

Respectfully submitted,

Date: October 15, 2025 By: */ Joseph P. Hamilton /*

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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of **PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE UNDER 37 C.F.R. § 42.64(b)(1)** was served electronically on October 15, 2025, in its entirety on the following counsel of record for Petitioner:

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