

Filed December 12, 2025

On behalf of **Imperative Care, Inc.**

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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

**PETITIONER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE
SERVED WITH PATENT OWNER'S SUR-REPLY**

Pursuant to 37 C.F.R. § 42.64(b), Petitioner Imperative Care, Inc. submits the following objections to the admissibility of evidence served with Patent Owner's Sur-Reply (Paper 24). Petitioner reserves its rights to: (1) timely file a motion to exclude Patent Owner's evidence, including evidence in the form of testimony or exhibits, or portions thereof; (2) challenge the credibility and/or weight that should be afforded Patent Owner's evidence, whether or not Petitioner files a motion to exclude the evidence; and (3) cross-examine any Patent Owner declarant within the scope of his or her direct testimony that relates to exhibits or other evidence, without regard to whether Petitioner has objected to the testimony or related exhibits or whether the testimony or related exhibits are ultimately found to be inadmissible.

Evidence	Objections
Exhibit 2011 – Declaration of Troy L. Thornton in Support of Inter Partes Review of U.S. Patent No. 11,697,011	Petitioner objects to Exhibit 2011, the Declaration of Troy L. Thornton in Support of Inter Partes Review of U.S. Patent No. 11,697,011, as untimely and improper evidence submitted with a patent owner's sur-reply in violation of 37 C.F.R. § 42.23(b).

Evidence	Objections
Exhibit 2012 - Declaration of Troy Thornton in Support of Opposition to Plaintiff's Motion for Preliminary Injunction	Petitioner objects to Exhibit 2012, the Declaration of Troy Thornton in Support of Opposition to Plaintiff's Motion for Preliminary Injunction, as untimely and improper evidence submitted with a patent owner's sur-reply in violation of 37 C.F.R. § 42.23(b). Petitioner additionally objects to Exhibit 2012 for lack of relevance under FRE 401 and 403. Exhibit 2012 is not cited or discussed in any Paper submitted during this proceeding, and it is therefore irrelevant to the issues in this proceeding. To the extent Patent Owner attempts to rely upon Exhibit 2012 in future Papers or arguments, the probative value, if any, of Exhibit 2012 would be substantially outweighed by unfair prejudice to Petitioner.
Exhibit 2013 – Deposition Transcript of Troy Thornton (August 15, 2025)	Petitioner objects to Exhibit 2013, the Transcript of the August 15, 2025 Deposition of Troy Thornton, as untimely and improper evidence submitted with a patent owner's sur-reply in violation of 37 C.F.R. § 42.23(b). Petitioner also incorporates the real-time objections made by Petitioner's counsel in Ex. 2013.
Exhibit 2014 - Deposition Transcript of Troy Thornton (November 20, 2025)	Petitioner incorporates the real-time objections made by Petitioner's counsel in Ex. 2014.

Respectfully submitted,

KNOBBE MARTENS OLSON & BEAR, LLP

Dated: December 12, 2025 By: /Joshua J. Stowell/

Joshua J. Stowell (Reg. No. 64,096)

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Attorneys for Petitioner

Imperative Care, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 37 C.F.R. § 42.6(e), a true and correct copy of **PETITIONER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE SERVED WITH PATENT OWNER'S SUR-REPLY** is being served electronically on December 12, 2025, to the e-mail addresses shown below:

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Dated: December 12, 2025 By: /Joshua J. Stowell/

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