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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 IPR2025-00289
Patent No. 11,554,005

**PETITIONER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE
SERVED WITH PATENT OWNER'S PRELIMINARY RESPONSE**

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 Preliminary Response (Paper 5). 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 2001 - Declaration of Paul J. Zalesky	<p>Petitioner’s objections to the Declaration of Paul J. Zalesky, Ex. 2001, are set forth below. To the extent Dr. Zalesky’s declaration incorporates objectionable material in the cited paragraphs below in any additional paragraphs or sections, Petitioner’s objections apply with equal force to those additional paragraphs or sections.</p> <p>Improper Testimony by Expert Witness (FRE 702-705):</p> <p>Patent Owner has not shown that the declarant is qualified to testify on the matters and opinions set out in the declaration. The testimony in ¶¶ 88, 101-103, 154, and 165-166 is not based on sufficient facts and data, does not disclose the underlying facts and data, and does not reliably apply facts and data using accepted scientific principles.</p>

Evidence	Objections
Ex. 2004 - Drawings Submitted During Prosecution of U.S. Patent Application No. 16/117,519	Incomplete and Lack of Authentication (FRE 106, 901) Petitioner objects to this exhibit (and the portions of any papers or declarations discussing or relying on this exhibits) as used by Patent Owner because it is incomplete Patent Owner has failed to produce any evidence sufficient to support a finding that the item is what the proponent claims it is.
Ex. 2005 - Deposition Transcript of Troy Thornton (September 30, 2024)	Petitioner incorporates the real-time objections made by Petitioner’s counsel in Ex. 2005.

Respectfully submitted,

KNOBBE MARTENS OLSON & BEAR, LLP

Dated: July 2, 2025

By: /Joshua J. Stowell/

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

Joseph R. Re (Reg. No. 31,291)

Brian C. Barnes (Reg. No. 75,805)

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 PRELIMINARY RESPONSE** is being served electronically on July 2, 2025, to the e-mail addresses shown below:

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Dated: July 2, 2025

By: /Joshua J. Stowell/

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

Attorneys for Petitioner
Imperative Care, Inc.