

Filed January 22, 2026

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 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 26). 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
Ex. 2032 - Supplemental Expert Declaration of Paul J. Zalesky Submitted as Exhibit 2008 in IPR2025-00156, involving U.S. Patent No. 11,697,012	<p>Petitioner objects to Exhibit 2032, the Supplemental Expert Declaration of Paul J. Zalesky Submitted as Exhibit 2008 in IPR2025-00156, involving U.S. Patent No. 11,697,012, as untimely and improper evidence submitted with a patent owner’s sur-reply in violation of 37 C.F.R. § 42.23(b).</p> <p>Petitioner objects to Exhibit 2032 as hearsay under FRE 801 and 802 that is not subject to any exception under FRE 803 or 804.</p> <p>Petitioner’s additional objections to the Supplemental Expert Declaration of Paul J. Zalesky Submitted as Exhibit 2008 in IPR2025-00156, involving U.S. Patent No. 11,697,012, 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>

Evidence	Objections
	<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 ¶¶ 81-82, 85, 90-92, 114, 124, 140, 143, 146, and 153-154 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>
Exhibit 2033 – Deposition Transcript of Troy Thornton (November 20, 2025)	Petitioner incorporates the real-time objections made by Petitioner’s counsel in Ex. 2033.
Exhibit 2034 – Declaration of Troy L. Thornton in Support of Inter Partes Review of U.S. Patent No. 11,697,011	Petitioner objects to Exhibit 2034, 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).
Exhibit 2035 – Declaration of Troy L. Thornton in Support of Inter Partes Review of U.S. Patent No. 11,844,921	Petitioner objects to Exhibit 2035, the Declaration of Troy L. Thornton in Support of Inter Partes Review of U.S. Patent No. 11,844,921, 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 2036 – Deposition Transcript of Troy Thornton (January 5, 2026)	Petitioner incorporates the real-time objections made by Petitioner’s counsel in Ex. 2036.

Respectfully submitted,

KNOBBE MARTENS OLSON & BEAR, LLP

Dated: January 22, 2026

By: /Joshua J. Stowell/

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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 January 22, 2026, to the e-mail addresses shown below:

<p>Joseph Hamilton Reg. No. 51,770 hamilton-ptab@perkinscoie.com Inari-Imperative@perkinscoie.com PERKINS COIE LLP 1888 Century Park East, Suite 1700 Los Angeles, CA 90067-1721 Tel: (310) 788-3271</p>	<p>Paul Parker Reg. No. 38,264 parker-ptab@perkinscoie.com Matthew Williams Reg. No. 77,516 williams-ptab@perkinscoie.com PERKINS COIE LLP 1201 Third Avenue, Suite 4900 Seattle, WA 98101-3099 Tel: (206) 359-8000</p>
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Dated: January 22, 2026

By: /Joshua J. Stowell/

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KNOBBE MARTENS OLSON & BEAR, LLP