

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN TUOZHU TECHNOLOGY CO., LTD.,
Petitioner,

v.

STRATASYS, INC.,
Patent Owner.

Case IPR2025-00321
Patent 9,421,713

PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner hereby submits the following objections to evidence filed with Patent Owner's Response of September 10, 2025.

<u>Evidence</u>	<u>Objections</u>
Exhibit 2014 Amended Declaration of Gary Larson	FRE 1002 (Requirement of the Original): Petitioner objects to paragraphs 15-22, appended Exhibit A (claim chart), and appended Exhibit E (screen capture images) of Exhibit 2014 for relying on images taken from a "CMB file" without providing "[a]n original writing, recording, or photograph [which] is required in order to prove its content." FRE 106 (Incomplete Evidence): Petitioner objects to paragraphs 15-22, appended Exhibit A (claim chart), and appended Exhibit E (screen capture images) of Exhibit 2014 for relying on images taken from a "CMB file" without providing the underlying file from which these images were allegedly derived. FRE 701 (Opinion Testimony by Lay Witnesses): This exhibit includes opinion testimony by a non-expert witness, including at least at paragraphs 16 and 24 (and elsewhere throughout the exhibit), that is "based on scientific, technical, or other specialized knowledge within the scope of Rule 702." FRE 702 (Testimony by Expert Witnesses): This exhibit includes opinion testimony regarding the functionality of "the Solo printer" and the "Fortus 400mc Large" printer, including at least at

	paragraphs 5-27 and appended Exhibit A (claim chart) without providing or identifying the underlying “sufficient facts or data” to support such assertions.
Exhibit 2015 Amended Declaration of Paul Leavitt	FRE 1002 (Requirement of the Original): Petitioner objects to paragraphs 15-22, appended Exhibit A (claim chart), and appended Exhibit E (screen capture images) of Exhibit 2014 for relying on images taken from a “CMB file” without providing “[a]n original writing, recording, or photograph [which] is required in order to prove its content.” FRE 106 (Incomplete Evidence): Petitioner objects to paragraphs 15-22, appended Exhibit A (claim chart), and appended Exhibit E (screen capture images) of Exhibit 2015 for relying on images taken from a “CMB file” without providing the underlying file from which these images were allegedly derived. FRE 701 (Opinion Testimony by Lay Witnesses): This exhibit includes opinion testimony by a non-expert witness, including at least at paragraphs 16 and 24 (and elsewhere throughout the exhibit), that is “based on scientific, technical, or other specialized knowledge within the scope of Rule 702.” FRE 702 (Testimony by Expert Witnesses): This exhibit includes opinion testimony regarding the functionality of “the Solo printer” and the “Fortus 400mc Large” printer, including at least at paragraphs 5-27 and appended Exhibit A

	(claim chart) without providing or identifying the underlying “sufficient facts or data” to support such assertions.
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For at least these reasons, Petitioner objects to Exhibits 2014 and 2015.

Petitioner reserves the right to move to exclude Exhibits 2014 and 2015.

Respectfully submitted,

Dated: September 17, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4)(i) *et seq.*, the undersigned certifies that on September 17, 2025, a complete and entire copy of this Petitioner's Objections to Evidence was provided by electronic mail to the Patent Owner by serving the correspondence e-mail address of record as follows:

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