

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

POSCO CO. LTD.,
Petitioner,

v.

ARCELORMITTAL,
Patent Owner.

Case No. IPR2025-00371
U.S. Patent No. 11,326,227

**PATENT OWNER'S OBJECTIONS
TO PETITIONER'S REPLY EXHIBITS**

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner submits the following objections to exhibits submitted by Petitioner its Petitioner's Reply to Patent Owner's Response. These objections are being timely filed within five business days of service of evidence to which the objection is directed.

Exhibit No.	Objection(s)
1082	Rebuttal Declaration of June Ann Munford Improper Reply under 37 C.F.R. § 42.23(b): This declaration and accompanying attachments are cited in connection with Petitioner's improper attempts to re-define and introduce new theories regarding the prior art status of the references contained in the grounds set forth in its Petition and is thus improper reply evidence. FRE 402/403/602/701/702/703/801/802: Ms. Munford is not qualified to provide testimony in the subject area, lacks foundation to provide testimony in the subject area, and/or improperly relies on hearsay. <i>E.g.</i>, ¶ 7 (providing opinions on Japanese language); ¶ 9 (providing unqualified testimony concerning "public availability" and speculating as to "likely earlier"); ¶ 10 (providing unqualified testimony and speculating about "interested researcher" and "interested person" and as to meaning of "#107636_JP-1" in Appendix SUEHIRO01); ¶ 11 (providing unqualified testimony and speculating about "interested person"; lacks foundation for annotation); ¶ 12 (providing unqualified testimony and speculating as to meaning of "#107636_JP-2" in Appendix SUEHIRO01); ¶ 13 (providing unqualified testimony and speculating about "interested person"; lacks foundation for annotation); ¶ 14 (providing unqualified testimony and speculating about expectations of researcher); ¶ 15 (providing unqualified testimony and speculating as to meaning of "#107636_JP-3" in Appendix SUEHIRO01 and about "person interested in hot-pressed steel"; lacks foundation for annotation); ¶ 16 (providing unqualified testimony and speculating about untranslated Appendix SUEHIRO08 and

	contents of website at various dates); ¶ 17 (providing unqualified testimony and speculating about “interested person” and public availability); ¶ 18 (new theory of public availability; providing unqualified testimony and speculating about undated link and undated Catalog); ¶ 19 (new theory of public availability; providing unqualified testimony and speculating about public availability); ¶ 20 (speculating as to meaning of SUEHIRO10; providing unqualified testimony and speculating about National Diet Library’s practices and navigating untranslated foreign language website); ¶ 21 (providing unqualified testimony and speculating about public availability and practices of National Diet Library and navigating untranslated foreign language website); ¶ 22 (providing unqualified testimony and navigating untranslated foreign language; speculating as to meaning of SUEHIRO10); ¶¶ 23, 25 (providing unqualified testimony and speculating about public availability and practices of National Diet Library); ¶ 24 (providing unqualified testimony and speculating about public availability and practices of National Diet Library; relying on hearsay); ¶¶ 26, 28, 29, 30, 37, 62 (providing unqualified testimony and speculating about public availability); ¶ 27 (new theory of public availability); ¶ 38 (providing unqualified testimony and speculating about “interested person”); ¶ 39 (providing unqualified testimony and speculating about patrons related to defense-related information); ¶¶ 40, 41, 42, 43 (irrelevant testimony about defense-related information); ¶ 44 (irrelevant testimony about defense-related information; providing unqualified testimony and speculating about people in the automotive industry, people interested in General Motors’ standards, and people in the aerospace, telecommunications, and electrical industries); ¶ 45 (irrelevant testimony about defense-related information; providing unqualified testimony); ¶ 46 (irrelevant testimony about “engineering students and other patrons”); ¶ 47 (providing unqualified testimony and speculating about search functionality and categories); ¶ 48 (providing unqualified testimony and speculating about search and indexing functionality, contents of website before and after December 2005, and practices of IHS); ¶ 49 (providing unqualified testimony and relying on hearsay); ¶ 50 (providing unqualified
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	testimony and speculating about contents and meaning of separate declarant's declaration); ¶ 51 (providing unqualified testimony and speculating about contents and meaning of separate declarant's declaration; irrelevant testimony about "library users"); ¶ 52 (providing unqualified testimony and speculating about contents and meaning of separate declarant's declaration; irrelevant testimony about "library patrons"); ¶ 53 (new theory; providing unqualified testimony and speculating about contents and meaning of separate declarant's declaration; irrelevant testimony about "average library user"); ¶ 54 (new theory; providing unqualified testimony and speculating about contents and meaning of separate declarant's declaration; irrelevant testimony about "library patrons at University of Dhaka"); ¶¶ 55, 56, 57 (new theory; providing unqualified testimony and speculating about contents and meaning of separate declarant's declaration; irrelevant testimony unrelated to University of Washington's practices); ¶¶ 58, 59 (providing unqualified testimony and speculating about contents and meaning of separate declarant's declaration; irrelevant testimony unrelated to University of Washington's practices); ¶ 60 (providing unqualified testimony and speculating about contents and meaning of separate declarant's declaration and functionality of static website); ¶ 61 (new theory); ¶ 63 (providing unqualified testimony and speculating about "library users"); ¶ 64 (providing unqualified testimony and speculating about contents and meaning of separate declarant's declaration); ¶ 65 (new theory; speculating about contents and meaning of separate declarant's declaration and functionality of static website); ¶¶ 66, 68, 69, 70, 71, 72 (speculating about contents and meaning of separate declarant's declaration and functionality of static website); ¶ 67 (speculating about contents and meaning of separate declarant's declaration and functionality of static website and about users); Appendices (inadmissible hearsay that does not fall under any exception).
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DATED: March 6, 2026

Respectfully Submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. § 42.120 of a copy of Patent Owner's Objections to Petitioner's Reply Exhibits was made upon Petitioner by email on March 6, 2026, to the following email addresses of record:

IPR58281-0003IP2@fr.com

DATED: March 6, 2026

By: //

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