

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Padagis US LLC,
Petitioner

v.

Neurelis, Inc.,
Patent Owner

Case No. IPR2025-00464
Patent No. 8,895,546

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner hereby submits the following objections to evidence filed with Petitioner's Reply of March 31, 2026.

Exhibit 1072: Gizurarson Declaration

Patent Owner objects to Exhibit 1072 under Fed. R. Evid. 401-403, as it was prepared in a different proceeding about a different patent. Further, Petitioner has not demonstrated its relevance, as Exhibit 1072 is not cited in Petitioner's Reply. Patent Owner objects to Exhibit 1072 as hearsay under Fed. R. Evid. 802.

Exhibit 1073: Brown Textbook

Patent Owner objects to Exhibit 1073 under Fed. R. Evid. 401-403. Petitioner has not demonstrated its relevance, as Exhibit 1073 is not cited in Petitioner's Reply.

Exhibit 1074: U.S. Patent No. 6,962,691

Patent Owner objects to Exhibit 1074 under Fed. R. Evid. 401-403. Petitioner has not demonstrated its relevance, as Exhibit 1074 is not cited in Petitioner's Reply.

Exhibit 1075: Excerpt of Prosecution History of 11/127,786

Patent Owner objects to Exhibit 1075 under Fed. R. 106 as it purports to contain only portions of a prosecution history, is taken out of context, and is incomplete. For example, Exhibit 1075 is missing a notice of abandonment and examiner interview (filed June 29, 2009), a non-final rejection (dated Nov. 24, 2008), and a supplemental response to the final office action filed with a Request for Continued Examination (Aug. 25, 2008).

Patent Owner objects to Exhibit 1075 under Fed. R. Evid. 401-403, as it is not relevant to any of the grounds of invalidity. Petitioner has not demonstrated its relevance, as Exhibit 1075 is not cited in Petitioner's Reply.

Patent Owner objects to Exhibit 1075 as hearsay under Fed. R. Evid. 802.

Exhibit 1076: Excerpt of Prosecution History of 13/371,274

Patent Owner objects to Exhibit 1076 under Fed. R. 106 as it purports to contain only portions of a prosecution history, is taken out of context, and is incomplete. Patent Owner requests that the full prosecution history of 13/371,274 be produced.

Patent Owner objects to Exhibit 1076 under Fed. R. Evid. 402-403, as it was prepared in a different proceeding about a different patent filed years after the priority date and is not relevant to any grounds of invalidity. Petitioner has not demonstrated its relevance, as Exhibit 1076 is not cited in Petitioner's Reply.

Patent Owner objects to Exhibit 1076 under Fed. R. 901-902 as it lacks signature or certification of authenticity.

Patent Owner objects to Exhibit 1076 as hearsay under Fed. R. Evid. 802.

Exhibit 1080: U.S. Patent No. 8,278,292

Patent Owner objects to Exhibit 1080 under Fed. R. Evid. 401-403. Petitioner has not demonstrated its relevance, as Exhibit 1080 is not cited in Petitioner's Reply.

Patent Owner reserves the right to move to exclude the above exhibits.

Date: April 7, 2026

Respectfully submitted,

/David J. Tobin/

David J. Tobin

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing PATENT OWNER'S OBJECTIONS TO EVIDENCE were served on counsel of record for the Petitioner by filing this document through PTAB P-TACTS and by sending the same via electronic mail to the following addresses:

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