

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REVVO TECHNOLOGIES, INC.

Petitioner,

v.

TIRE STICKERS LLC

Patent Owner.

IPR2025-00631

Patent 11,124,027

**PATENT OWNER'S SUPPLEMENTAL EVIDENCE AND RESPONSE TO
PETITIONER'S OBJECTIONS**

On November 25, 2025, Petitioner provided a conclusory listing of objections to evidence submitted with Patent Owner's Response. However, Petitioner failed to provide any specificity or explanation from which its objections were founded to enable Patent Owner, or the Board, to assess and respond to the objections. Such conclusory listings of objections are improper and deprive Patent Owner of its right to present supplementary evidence under 37 C.F.R. 42.64(b).

Regulations require Petitioner to "identify the grounds for the objection with sufficient particularity to allow correction in the form of supplemental evidence." 37 C.F.R. 42.64(b). Petitioner has not done this. For each objection, Petitioner simply provided boilerplate listings of objections. For example, Petitioner objects to exhibit 2025 with the following conclusory listing of objections: "Petitioner objects to at least paragraphs 4-7 and 9 of this exhibit under FRE 901 (lacks foundation), 402 (lacks relevance), 403 (misleading, confusing, unfair prejudice), 702 (improper expert testimony), 801/802 (inadmissible hearsay), and 106 (incomplete). Petitioner further objects to paragraph 9 of this exhibit because it includes a URL link that has not separately been included as an exhibit." Similarly, for Exhibit 2026 Petitioner states in conclusory fashion: "Petitioner objects to Exhibit 2026 under FRE 901 (lack of authentication), 402 (lack of relevance), 403 (misleading, confusing, unfair prejudice), and 106 (incomplete)." For Exhibits 2029-2035 and 2040, Petitioner states: "These exhibits are webpage printouts.

Petitioner objects to each exhibit under FRE 901 (lack of authentication), 402 (lack of relevance), 801/802 (inadmissible hearsay), and 106 (incomplete).” Petitioner’s other objections are laid out in similar fashion without particularity.

To properly object to evidence, Petitioner “must identify the grounds of the objection with *sufficient particularity* to allow correction in the form of supplemental evidence,” 37 C.F.R. § 42.64(b)(1) (emphasis added). Sufficient particularity requires more than listing Federal Rules with general objections. *B/E Aerospace, Inc. v. Mag Aerospace Indus., LLC*, IPR2014-01511, Paper 104, at 7-11, (PTAB Mar. 18, 2016) (party failed to object with sufficient particularity by making boilerplate objections). The sufficient particularity requirement prevents denying the party offering evidence from having a fair opportunity to correct any alleged issues during the limited discovery of an IPR trial. *See Apple Inc. v. Achates Reference Publishing, Inc.*, IPR2013-00080, Paper 90 at 49 (PTAB Jun. 2, 2014). Petitioner’s Objection baldly lists the Federal Rules of Evidence without any explanation in violation of 37 C.F.R. § 42.64(b)(1).

Thus, for each exhibit objected to, Patent Owner was not provided the basis for the objection with sufficient particularity to enable Patent Owner to determine whether any correction is required. For example, Petitioner’s stock objections i) do not identify whether the basis of an objection is directed to a specific portion or part of the exhibits, nor ii) how the alleged objection is being applied, such as explaining

in what way the exhibit is allegedly “incomplete,” or “misleading/ consuming/ prejudicial,” or irrelevant. Petitioner is forced to guess the particular basis for the objection and to guess which of the stock objections applies to a particular portion of an exhibit or evidence. This is not proper and is the result that the requirement of 37 C.F.R. 42.64(b) is intended to prevent. Further, Petitioner ignores that even inadmissible evidence may be proper subject of expert testimony, yet Petitioner fails to make any objection that the evidence is an improper basis of expert testimony.

For at least these reasons, Petitioner's Objections do not comply with 37 C.F.R. § 42.64(b) as they provide no basis for which Patent Owner can respond, assess, and/or provide supplemental evidence.

Out of an abundance of caution, Patent Owner also provides supplemental exhibits 2044 and 2045, which confirm that Patent Owner's exhibits meet the evidentiary and authenticity requirements applied by the Board. *Mylan Pharms. Inc. v. Regeneron Pharms., Inc.*, IPR2021-00880, Paper 89 at 15 (PTAB Nov. 9, 2022) (“Federal Rule of Evidence 901 sets a relatively low bar for authentication.”).

Respectfully submitted,

Dated: December 9, 2025

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