UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRAUMANN USA, LLC,
Petitioner,

v.

SMART DENTURE CONVERSIONS, LLC,
Patent Owner.

Case No. IPR2025-00956
U.S. Patent No. 11,937,992

PETITIONER'S OBJECTIONS TO EVIDENCE PURSUANT TO 37 C.F.R. § 42.64(b)(1)

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Straumann USA, LLC ("Petitioner") submits the following objections to new evidence submitted by Patent Owner Smart Denture Conversions, LLC ("Patent Owner"), and any reference to or reliance on the foregoing. Petitioner's objections are timely under 37 C.F.R. § 42.64(b)(1) because the objections have been filed within 5 business days of service of Patent Owner's Response (Paper 26), served on March 13, 2026. As required by 37 C.F.R. § 42.62, Petitioner's objections below apply the Federal Rules of Evidence.

1. Objections to Exhibit 2021

Petitioner objects to Exhibit 2021 (Second Declaration of Karl Leinsing) because Patent Owner has not introduced admissible evidence to establish that Mr. Leinsing is a qualified expert as required by Fed. R. Evid. 702.

In particular, Patent Owner has failed to introduce any evidence that establishes that Mr. Leinsing has the knowledge, skill, experience or training of a person of ordinary skill in the art ("POSA"). In the institution decision, the Board tentatively adopted Petitioner's definition of a POSA, which requires "at least five years of experience working with (researching, developing and/or designing) dental implants and prostheses, including familiarity and experience with fasteners (threaded and otherwise) used to connect prostheses, implants and related components." Paper 12 at 12–13 (citing Petition (Paper 1) at 31, Ex. 1002, ¶¶128–

130). Patent Owner has not introduced evidence that demonstrates that Mr. Leinsing has the required experience to be a POSA qualified to provide the expert testimony set forth in Exhibit 2021. In particular, there is no evidence that Mr. Leinsing has any experience working with dental implants and prostheses, much less the required years of experience. Instead, the "Background and Qualifications" section of Mr. Leinsing's declaration states that he is a medical device engineer with experience working with medical devices, including "implants and devices in the medical field" and surgical fasteners, but his declaration does not state that he has experience with dental implants and prostheses. Ex. 2021, ¶¶4–10.

2. Objections to Exhibits 2023 and 2029

Petitioner objects to Exhibit 2023 (Trends in Dental Implant Use in the U.S., 1999–2016, and Projections to 2026) and Exhibit 2029 (Case Report from the Brazilian Journal of Implantology and Health Sciences) as inadmissible hearsay under Fed. R. Evid. 802 for which no exception has been established, to the extent either is offered by Patent Owner to prove the truth of any matter asserted therein.

Patent Owner cites Exhibit 2023 in support of the following statement: "Over this same time, 'dental implant prevalence among US adults with missing teeth … substantially increased.'" Patent Owner Response (Paper 26) at 74 (citing Ex. 2023 at 1). Patent Owner cites Exhibit 2029 in support of the following

statement: "A 2024 published case report calls NeoConvert 'a novel, more precise, and time-saving denture conversion technique.'" Paper 26 at 74 (citing Ex. 2029 at 3). Both statements constitute inadmissible hearsay, because Patent Owner is attempting to use Exhibit 2023 and Exhibit 2029 to establish facts about dental implant prevalence and the NeoConvert product, respectively. Moreover, the exception in Fed. R. Evid. 803(18) does not apply because Mr. Leinsing does not rely on, and did not consider, Exhibit 2023 or Exhibit 2029 in forming his opinions. *See* Ex. 2021 at 7–10.

3. Objections to Exhibit 2024

Petitioner objects to Exhibit 2024 (Smart on X website) as inadmissible hearsay under Fed. R. Evid. 802 for which no exception has been established, to the extent it is offered by Patent Owner to prove the truth of any matter asserted therein.

Patent Owner cites Exhibit 2024 in support of the following statement: "Patent Owner began selling its revolutionary Smart Denture Conversions products at the end of 2019 and experienced explosive growth because of their significant advantages over traditional open- and closed-tray techniques, including their stability, strength, convenience, and accuracy." *See* Patent Owner Response (Paper 26) at 75 (citing Ex. 2024). This constitutes inadmissible hearsay, because Patent Owner is attempting to use Exhibit 2024 to establish facts about its products.

Petitioner further objects to Exhibit 2024 because Patent Owner has not introduced any admissible evidence to authenticate this exhibit, as required under Fed. R. Evid. 901(a), and also has not introduced any admissible evidence to establish that Exhibit 2024 is self-authenticating under Fed. R. Evid. 902.

4. Objections to "Product Talk" Video

Petitioner objects to "Product Talk, Season 18 Episode 3, Neodent® NeoConvert™ - Drew Phillips, DMD (July 1, 2024), available at https://bit.ly/4b7PQa6," which appears to be an online video interview cited by Patent Owner as evidence in its Patent Owner Response, but not submitted as an exhibit in violation of 37 C.F.R. § 42.63(a), which requires that "[a]ll evidence must be filed in the form of an exhibit."[1]

Petitioner further objects to this evidence as inadmissible hearsay under Fed. R. Evid. 802 for which no exception has been established, to the extent it is offered by Patent Owner to prove the truth of any matter asserted therein. In particular, Patent Owner made the following statements in its Patent Owner Response that quote excerpts from this interview by a "practitioner" (that Patent Owner did not identify) about Petitioner's NeoConvert:

[1] Patent Owner included a citation to this video in its "Table of Abbreviations" in its Patent Owner Response (Paper 26 at 12 ("Product Talk")) but did not include it as an exhibit (*id.* at 8-10).

- "[H]e 'hated' 'the old-school way' of doing conversions: 'not only is it not fun for the patient, but it's expensive and takes up a lot of chairtime.'" (Paper 26 at 77 (citing Product Talk at 1:49));
- "He bragged that conversions with NeoConvert result in 'extremely small' 'screw access holes,' meaning "[t]he integrity of that denture has not been compromised at all.'" (*id.* (citing Product Talk at 10:33));
- "You look at it, and it's like, oh, this looks like the world's greatest technician did it." (*id.* (citing Product Talk at 10:40));
- "He said that he could 'get the patient out of the chair in thirty minutes' and that NeoConvert 'is so easy, you don't need a lab technician.'" (*id.* (citing Product Talk at 11:47, 12:20));
- "'I'm really excited to see what this product will do for the full-arch world of dentistry,' he concluded, saying that 'it's definitely going to disrupt some things' in "a good way.'" (*id.* (citing Product Talk at 17:40)).

These statements constitute inadmissible hearsay, because Patent Owner is attempting to use these statements to establish facts about NeoConvert.

Petitioner further objects to evidence from this Product Talk episode because Patent Owner has not introduced any admissible evidence to authenticate these statements, as required under Fed. R. Evid. 901(a), and also has not introduced any

admissible evidence to establish that this evidence is self-authenticating under Fed. R. Evid. 902.

Dated: March 20, 2026

Respectfully submitted,

/s/ Sheila Mortazavi
Sheila Mortazavi
Reg. No. 43,343

Counsel for Petitioner Straumann USA, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on March 20, 2026, Petitioner's Objections to Evidence Pursuant to 37 C.F.R. § 42.64(b)(1) was served on counsel for Patent Owner as provided in 37 C.F.R. § 42.6(e) via electronic mail, to the following email addresses:

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