Filed: November 6, 2025

On behalf of **Imperative Care, Inc.**
By: Joshua J. Stowell (Reg. No. 64,096)
Joseph R. Re (Reg. No. 31,291)
Brian C. Barnes (Reg. No. 75,805)
KNOBBE, MARTENS, OLSON & BEAR, LLP
2040 Main Street, 14th Floor
Irvine, CA 92614
Tel.: (949) 760-0404
Fax: (949) 760-9502
Email: BoxImperative291@knobbe.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IMPERATIVE CARE, INC.,
Petitioner,

v.

INARI MEDICAL, INC.,
Patent Owner.

Case IPR2025-00989
Patent No. 11,865,291

PETITIONER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE SERVED WITH PATENT OWNER'S PRELIMINARY RESPONSE

Pursuant to 37 C.F.R. § 42.64(b), Petitioner Imperative Care, Inc. submits the following objections to the admissibility of evidence served with Patent Owner's Preliminary Response (Paper 6). Petitioner reserves its rights to: (1) timely file a motion to exclude Patent Owner's evidence, including evidence in the form of testimony or exhibits, or portions thereof; (2) challenge the credibility and/or weight that should be afforded Patent Owner's evidence, whether or not Petitioner files a motion to exclude the evidence; and (3) cross-examine any Patent Owner declarant within the scope of his or her direct testimony that relates to exhibits or other evidence, without regard to whether Petitioner has objected to the testimony or related exhibits or whether the testimony or related exhibits are ultimately found to be inadmissible.

Evidence	Objections
Exhibit 2001 - Declaration of Paul J. Zalesky	Petitioner's objections to the Declaration of Paul J. Zalesky, Ex. 2001, are set forth below. To the extent Dr. Zalesky's declaration incorporates objectionable material in the cited paragraphs below in any additional paragraphs or sections, Petitioner's objections apply with equal force to those additional paragraphs or sections. **Improper Testimony by Expert Witness (FRE 702-705):** Patent Owner has not shown that the declarant is qualified to testify on the matters and opinions set out in the declaration. The testimony in ¶¶ 82, 87-89, 138, and 150-151 is not based on sufficient facts and data, does not disclose the underlying facts and data, and does not reliably apply facts and data using accepted scientific principles.

Evidence	Objections
Ex. 2005 - Deposition Transcript of Troy Thornton (September 30, 2024)	Petitioner incorporates the real-time objections made by Petitioner's counsel in Ex. 2005.
Ex. 2006 - Deposition Transcript of Troy Thornton (March 19, 2025)	Petitioner incorporates the real-time objections made by Petitioner's counsel in Ex. 2006.
Ex. 2007 - Deposition Transcript of Troy Thornton (June 25, 2025)	Petitioner incorporates the real-time objections made by Petitioner's counsel in Ex. 2007.

Respectfully submitted,

KNOBBE MARTENS OLSON & BEAR, LLP

Dated: November 6, 2025

By: /*Joshua J. Stowell*/
Joshua J. Stowell (Reg. No. 64,096)
Joseph R. Re (Reg. No. 31,291)
Brian C. Barnes (Reg. No. 75,805)

Attorneys for Petitioner
Imperative Care, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 37 C.F.R. § 42.6(e), a true and correct copy of **PETITIONER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE SERVED WITH PATENT OWNER'S PRELIMINARY RESPONSE** is being served electronically on November 6, 2025, to the e-mail addresses shown below:

Joseph Hamilton
Reg. No. 51,770
hamilton-ptab@perkinscoie.com
Inari-Imperative@perkinscoie.com
PERKINS COIE LLP
1888 Century Park East, Suite 1700
Los Angeles, CA 90067-1721
Tel: (310) 788-3271

Paul Parker
Reg. No. 38,264
parker-ptab@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Tel: (206) 359-8000

Inari-Imperative@perkinscoie.com

Dated: November 6, 2025

By: */Joshua J. Stowell/*
Joshua J. Stowell (Reg. No. 64,096)

Attorneys for Petitioner
Imperative Care, Inc.

62360306