

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

CENTRALSQUARE TECHNOLOGIES, LLC,

Petitioner,

v.

CARBYNE, LTD,

Patent Owner.

Case No. IPR2025-01179

U.S. Patent No. 11,689,383

**PETITIONER'S OBJECTIONS TO
PATENT OWNER'S SUR-REPLY EVIDENCE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner CentralSquare Technologies, LLC ("Petitioner") submits the following objections to certain exhibits submitted by Patent Owner Carbyne, Ltd. ("Patent Owner") with its Patent Owner's Sur-Reply, filed in the *inter partes* review proceeding IPR2025-01179 with respect to U.S. Patent No. 11,689,383 ("383 Patent"). These objections apply equally to Patent Owner's reliance on these exhibits in any subsequently filed documents. These objections are timely filed and served within five business days of the filing and service of the Patent Owner's Sur-Reply on July 21, 2026. *See* Paper 12 (Scheduling Order); Paper 15 (Joint Stipulation to Adjust Due Dates); Paper 26 (Joint Stipulation to Adjust Due Dates).

A. Exhibit 2015 (Transcript of July 16, 2026 Stuart Lipoff Deposition)

Petitioner objects to Patent Owner's Exhibit 2015 under Federal Rule of Evidence ("FRE") 106 because Patent Owner has only introduced *part* of a statement. Exhibit 2015 is the transcript of the July 16, 2026 deposition of Petitioner's expert, Mr. Stuart Lipoff. Pages 64–71 of Exhibit 2015 contain testimony concerning pre-marked Exhibit 1021, which was not included with Patent Owner's Sur-Reply evidence. FRE 106 provides that "an adverse party may require the introduction, at that time, of any other part — or any other statement — that in fairness ought to be considered at the same time." Because Mr. Lipoff's testimony as set forth in Patent Owner's Exhibit 2015 directly discusses pre-marked Exhibit

1021, submission of Exhibit 2015 alone (without Exhibit 1021) is an incomplete writing or recorded statement. All other exhibits admitted during the July 16, 2026 deposition of Mr. Lipoff are already of record in this proceeding.

Dated: July 28, 2026

Respectfully submitted,

By: /s/ Gianni Cutri

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing
**PETITIONER'S OBJECTIONS TO PATENT OWNER'S SUR-REPLY
EVIDENCE** was served on July 28, 2026 via email directed to counsel of record for
the Patent Owner at the following:

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Dated: July 28, 2026

By: /s/ Vicki Merideth
Vicki Merideth
Case Manager
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