UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IMPERATIVE CARE, INC.,
Petitioner,

v.

INARI MEDICAL, INC.,
Patent Owner.

Case **IPR2025-01264**
Patent No. **12,016,580**

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

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner submits the following objections to exhibits filed by Petitioner, Imperative Care, Inc., with Petitioner's Reply to Patent Owner's Response, on June 4, 2026. Patent Owner's objections apply equally to Petitioner's reliance on these exhibits in its Reply or any subsequently-filed documents. These objections are timely, having been served within five (5) business days of service of the evidence to which each objection is directed.

Exhibit 1067

Patent Owner objects to Exhibit 1067 (Supplemental Declaration of Troy L. Thornton) under FRE 702 because the testimony is not based upon sufficient facts or data and is not the result of application of reliable principles and methods. Patent Owner further objects under FRE 703 that the facts or data are not of a type reasonably relied upon by experts. Patent Owner further objects to Exhibit 1067 as creating unfair prejudice, confusing the issues, or as a waste of time pursuant to FRE 403 and as not being relevant and therefore being inadmissible under FRE 401 and 402. Mr. Thornton fails to meet the qualifications of a POSA or an expert in the field of the '580 patent, and has no experience in the field of the '580 patent.

Patent Owner further objects to Exhibit 1067 to the extent that any paragraph relies upon an exhibit that is objected to herein for the reasons set forth in those

objections. Any paragraph in Exhibit 1067 that relies upon any exhibit not relied upon by the PTAB to institute this proceeding is further objected to as not being relevant and therefore being inadmissible under FRE 401 and 402. Patent Owner likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit No. 1067.

Exhibit 1054

Patent Owner objects to Exhibit 1054 (Dictionary Definition of Material) as confusing the issues or as a waste of time pursuant to FRE 403 and as not being relevant and therefore being inadmissible under FRE 401 and 402. Patent Owner objects to Exhibit 1054 pursuant to FRE 901 as lacking authentication or evidence sufficient to support a finding that the document is what Petitioner claims it to be. Patent Owner likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit No. 1054.

Exhibit 1069

Patent Owner objects to Exhibit 1069 (Gibbs, "Temporary stent…") as confusing the issues or as a waste of time pursuant to FRE 403 and as not being relevant and therefore being inadmissible under FRE 401 and 402. Patent Owner objects to Exhibit 1069 pursuant to FRE 901 as lacking authentication or evidence sufficient to support a finding that the document is what Petitioner claims it to be.

Patent Owner likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit No. 1069.

Exhibit 1070

Patent Owner objects to Exhibit 1070 (Edwards Lifesciences, "Fogarty Occlusion Catheters…") as confusing the issues or as a waste of time pursuant to FRE 403 and as not being relevant and therefore being inadmissible under FRE 401 and 402. Patent Owner objects to Exhibit 1070 pursuant to FRE 901 as lacking authentication or evidence sufficient to support a finding that the document is what Petitioner claims it to be. Patent Owner likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit No. 1070.

Exhibit 1075

Patent Owner objects to Exhibit 1075 (MitraClip Instructions) as confusing the issues or as a waste of time pursuant to FRE 403 and as not being relevant and therefore being inadmissible under FRE 401 and 402. Patent Owner objects to Exhibit 1075 pursuant to FRE 901 as lacking authentication or evidence sufficient to support a finding that the document is what Petitioner claims it to be. Patent Owner likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit No. 1075.

Exhibit 1076

Patent Owner objects to Exhibit 1076 (FDA Summary for MitraClip) as confusing the issues or as a waste of time pursuant to FRE 403 and as not being relevant and therefore being inadmissible under FRE 401 and 402. Patent Owner objects to Exhibit 1076 pursuant to FRE 901 as lacking authentication or evidence sufficient to support a finding that the document is what Petitioner claims it to be. Patent Owner likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit No. 1076.

Exhibit 1077

Patent Owner objects to Exhibit 1077 (Thornton, et al., "MitraClip System Design…") as confusing the issues or as a waste of time pursuant to FRE 403 and as not being relevant and therefore being inadmissible under FRE 401 and 402. Patent Owner objects to Exhibit 1077 pursuant to FRE 901 as lacking authentication or evidence sufficient to support a finding that the document is what Petitioner claims it to be. Patent Owner likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit No. 1077.

Exhibit 1078

Patent Owner objects to Exhibit 1078 (Fann, et al., "Beating Heart…") as confusing the issues or as a waste of time pursuant to FRE 403 and as not being

relevant and therefore being inadmissible under FRE 401 and 402. Patent Owner objects to Exhibit 1078 pursuant to FRE 901 as lacking authentication or evidence sufficient to support a finding that the document is what Petitioner claims it to be. Patent Owner likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit No. 1078.

Respectfully submitted,

Date: June 11, 2026 By: */ Joseph P. Hamilton /*

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of **PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE UNDER 37 C.F.R. § 42.64(b)(1)** was served electronically on June 11, 2026, in its entirety on the following counsel of record for Petitioner:

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