

Filed: July 16, 2026

On behalf of **Imperative Care, Inc.**

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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

**PETITIONER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE
SERVED WITH PATENT OWNER'S SUR-REPLY**

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 Response (Paper 31). 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 2010 – Supplemental Declaration of Brian Brown (EX2008) in <i>Imperative Care, Inc. v. Inari Medical Inc.</i> , IPR2025-01025	<p>Petitioner objects to Exhibit 2010, the Supplemental Expert Declaration of Brian Brown Submitted as Exhibit 2008 in IPR2025-01025, involving U.S. Patent No. 11,974,910, as untimely and improper evidence submitted with a patent owner's sur-reply in violation of 37 C.F.R. § 42.23(b).</p> <p>Petitioner also objects to Exhibit 2010 as set forth below. To the extent Mr. Brown'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.</p> <p>Improper Testimony by Expert Witness (FRE 702-705):</p> <p>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 ¶¶ 32, 49, 51, 53, 66-67, 78, 80, 86, 87 is not based on sufficient facts and data, does not disclose the</p>

Evidence	Objections
	<p>underlying facts and data, and does not reliably apply facts and data using accepted scientific principles.</p> <p>Relevance (FRE 401-403)</p> <p>Petitioner objects to the testimony in ¶¶80, 108 as irrelevant and prejudicial under FRE 401-403.</p> <p>Hearsay (FRE 801-802)</p> <p>Petitioner objects to Exhibit 2010 because the testimony provided therein is hearsay not subject to any exception.</p>
Exhibit 2018 – Deposition Transcript of Troy Thornton (July 1, 2026)	Petitioner incorporates the real-time objections made by Petitioner’s counsel in Ex. 2018.
Exhibit 2019 – Deposition Transcript of Troy Thornton (March 19, 2025)	Petitioner incorporates the real-time objections made by Petitioner’s counsel in Ex. 2019.

Respectfully submitted,

KNOBBE MARTENS OLSON & BEAR, LLP

Dated: July 16, 2026

By: /Joshua J. Stowell/

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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 SUR-REPLY** is being served electronically on July 16, 2026, to the e-mail addresses shown below:

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