

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JESCO LIGHTING GROUP, LLC,
Petitioner,

v.

AGS LIGHTING MANAGMENT LLC,
Patent Owner.

Case IPR2025-01328
Patent No. 11,751,302

**PATENT OWNER'S OBJECTIONS TO EVIDENCE
UNDER 37. C.F.R. § 42.64**

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner (“AGS Lighting”) submits the following objections to Petitioner’s exhibits. These objections are timely, having been filed within five business days of the filing of Petitioner’s Reply. AGS Lighting objects to the following exhibits:

Exhibit No.	Description
1028	Reply Declaration of J. Gary Eden
1029	Excerpts from the Deposition Transcript of Dr. Thomas Katona, taken on July 2, 2026.
1030	<i>Vaxcel International Co., Ltd., v. Heathco LLC</i> , C.A. No. 20-224-VAC, Dkt. 230-8, Expert Report of Thomas M. Katona, Ph.D. Concerning Invalidity of U.S. Patent Nos. 10,136,503; 9,326,362; 10,154,564; and 10,667,367, dated June 28, 2022.
1031	TPS61042 Constant Current LED Driver

Exhibit 1028

AGS Lighting objects to Exhibit 1028 because it improperly introduces new theories, arguments, and evidence for the first time on Reply. Admissibility of such declaration would permit Petitioner to violate the requirement that it must include all its theories, arguments, and evidence with its Petition.

FRE 602, 702, 703: AGS Lighting objects to this exhibit to the extent it is

irrelevant, the testimony is based on a lack of personal knowledge or speculation, includes insufficient facts or data, is not based on a reliable foundation, and constitutes conclusory opinions without sufficient support.

FRE 401, 402, and 403: AGS Lighting objects to this exhibit because it does not rebut the arguments in Patent Owner's Response, it is irrelevant, and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, wasting time, and needlessly presenting cumulative evidence.

Exhibit 1029

FRE 106: AGS Lighting objects to this exhibit under FRE 106 because the testimony was provided only in excerpts and should not in fairness be considered without the introduction of other testimony and/or evidence for completeness.

AGS Lighting further objects to Exhibit 1029 because it was submitted without allowing for Dr. Katona to review his deposition testimony and make any corrections if applicable.

Exhibit 1030

FRE 802: AGS Lighting objects to this exhibit as it constitutes inadmissible hearsay offered for the truth of the matter asserted.

FRE 401, 402, and 403: AGS Lighting objects to this exhibit because it does not rebut the arguments in Patent Owner's Response, it is irrelevant, and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, wasting time, and needlessly presenting cumulative evidence.

FRE 901: AGS Lighting objects to this exhibit under FRE 901 for lacking evidence of authentication. Exhibit 1030 has not been shown to be self-authenticating, and Petitioner has not produced any evidence sufficient to support a finding that the exhibit is what Petitioner claims it to be. Use of unauthenticated documentations is not reasonable, particularly to the extent they are relied upon for the truth of the matter asserted.

Exhibit 1031

AGS Lighting objects to Exhibit 1031 because it improperly introduces new theories, arguments, and evidence for the first time on Reply. Admissibility of such exhibit would permit Petitioner to violate the requirement that it must include all its theories, arguments, and evidence with its Petition.

AGS Lighting further objects to this exhibit to the extent that Petitioner attempts to rely on this exhibit as prior art or to show the alleged state of the art or understanding of a POSITA. Petitioner has not demonstrated that this exhibit is a

“printed publication” within the meaning of 35 U.S.C. §§ 102 and 311(b).

FRE 401, 402, and 403: AGS Lighting objects to this exhibit because it does not rebut the arguments in Patent Owner's Response, it is irrelevant, and its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, wasting time, and needlessly presenting cumulative evidence.

FRE 802: AGS Lighting objects to this exhibit as it constitutes inadmissible hearsay offered for the truth of the matter asserted.

FRE 901: AGS Lighting objects to this exhibit under FRE 901 for lacking evidence of authentication. Exhibit 1031 has not been shown to be self-authenticating, and Petitioner has not produced any evidence sufficient to support a finding that the exhibit is what Petitioner claims it to be. Use of unauthenticated documentations is not reasonable, particularly to the extent they are relied upon for the truth of the matter asserted.

Patent Owner's Objections to Evidence
Case IPR2025-01328
Patent No. 11,751,302

Respectfully submitted,

Date: July 20, 2026

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing PATENT OWNER'S
OBJECTIONS TO EVIDENCE was served electronically via email on July 20,
2026, on the following counsel of record for Petitioner:

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RADULESCU LLP

Respectfully submitted,

Date: July 20, 2026

By: /Bradley S. Bowling/
Bradley S. Bowling (Reg. # 52,641)