UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOUGHBUILT INDUSTRIES, INC.,
Petitioner

v.

MERIDIAN INTERNATIONAL CO., LTD.,
Patent Owner

Case IPR2025-01462
U.S. Patent No. 11,192,689

PETITIONER'S OBJECTIONS TO EVIDENCE

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

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Petitioner ToughBuilt Industries, Inc. ("Petitioner") objects under the Federal Rules of Evidence (FRE) and 37 C.F.R. § 42.64(b)(1) to the admissibility of Exhibit 2012 (the "Challenged Evidence"), filed by Patent Owner Meridian International Co., Ltd. ("Patent Owner"), with the Patent Owner's Response. Petitioner's Objections are timely filed under 37 C.F.R. § 42.64(b)(1), within five business days of May 14, 2026. Petitioner files these Objections to provide notice to Patent Owner that Petitioner may move to exclude the Challenged Evidence under 37 C.F.R. § 42.64(c).

I. IDENTIFICATION OF GROUNDS FOR OBJECTIONS

A. Exhibit 2012

Exhibit 2012 is a declaration from Glenn E. Vallee, Ph.D., P.E. ToughBuilt objects to Exhibit 2012, including paragraph 31 and 91, under FRE 601 and 602 because Patent Owner has not shown that Dr. Vallee is competent to testify as a witness and he lacks requisite personal knowledge of the subject matter upon which he testifies.

ToughBuilt objects to Exhibit 2012, including paragraphs 30-220, as improper expert testimony under FRE 702, 703, and 37 C.F.R. § 42.65. Patent Owner has not shown that Dr. Vallee is qualified to testify as an expert in the relevant subject matter or that his testimony is based on sufficient facts or data, is the product of reliable principles or methods, or that the testimony will help the

Board understand the evidence or determine a fact in issue.

II. CONCLUSION

In view of the Objections set forth above, Petitioner may file a motion to exclude the Challenged Evidence under 37 C.F.R. § 42.64(c).

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that the above-captioned **PETITIONER'S OBJECTIONS TO EVIDENCE** was served in its entirety on May 21, 2026, upon the following parties via electronic mail:

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