UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GE HEALTHCARE LTD.,
Petitioner

v.

THE JOHNS HOPKINS UNIVERSITY,
Patent Owner

Case IPR2026-00069
U.S. Patent No. 11,938,201

PATENT OWNER THE JOHNS HOPKINS UNIVERSITY'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

Patent Owner The Johns Hopkins University ("Patent Owner") objects under the Federal Rules of Evidence (FRE) and 37 C.F.R. § 42.64(b)(1) to the admissibility of Exhibits 1003, 1006, 1007, 1029, 1030, 1035, 1039, 1040, 1043, 1045, 1047, and 1048 (the "Challenged Evidence"), filed by Petitioner GE Healthcare Ltd. ("Petitioner") on October 21, 2025, with the Petition for *Inter Partes* Review (Paper 1). Patent Owner's Objections are timely filed under 37 C.F.R. § 42.64(b)(1) within ten business days of the March 23, 2026 Institution Decision (Paper 7). Patent Owner files these Objections to provide notice to Petitioner that Patent Owner may move to exclude the Challenged Evidence under 37 C.F.R. § 42.64(c).

I. IDENTIFICATION OF GROUNDS FOR OBJECTIONS

A. Exhibit 1003

Exhibit 1003 is the Declaration of Dr. Brian Zeglis. Patent Owner objects to paragraphs 15-16, 22-26, 44, 46, 50, 51, 52, 63-66, 68, 73, 75, 92, 94-96, 98, 105, 118, 131, 136-38, 141, 144-145, 155, 162-164, 166-167, 169-171, 173-175, 178, 180-182, 185-186, 190-192, 194, 212-213, and 215-216 of Exhibit 1003 under F.R.E. 402 and 403. Petitioner does not cite these declaration paragraphs in its Petition, rendering Dr. Zeglis's testimony in these paragraphs irrelevant under F.R.E. 401. Patent Owner therefore objects to these paragraphs under F.R.E. 402. Patent Owner also objects to this testimony under F.R.E. 403 because it has no

probative value, creates unfair prejudice to Patent Owner, and will only confuse the issues and waste the Board's time.

B. Exhibit 1006

Exhibit 1006 purports to be an article from *Journal of Medicinal Chemistry* by Jansen, K., et al., "Extended Structure—Activity Relationship and Pharmacokinetic Investigation of (4-Quinolinoyl)glycy1-2-cyanopyrrolidine Inhibitors of Fibroblast Activation Protein (FAP)." Patent Owner objects to Exhibit 1006 because it is incomplete. Petitioner did not submit the "Supporting Information" referred to on page 3053 of Exhibit 1006. Therefore, Exhibit 1006 is not a "duplicate" as defined by F.R.E. 1001(e) insofar as the exhibit is not "a counterpart … that accurately reproduces the original." Patent Owner also objects to Exhibit 1006 under F.R.E. 106 because the document is incomplete and includes only a select portion of a larger document that in fairness should be considered along with this document.

C. Exhibit 1007

Exhibit 1007 purports to be an article from *ACS Medicinal Chemistry Letters* by Jansen, K., et al., "Selective Inhibitors of Fibroblast Activation Protein (FAP) with a (4-Quinolinoy1)-glycy1-2-cyanopyrrolidine Scaffold." Patent Owner objects to Exhibit 1007 because it is incomplete. Petitioner did not submit the "Supporting Information" referred to on page 491 of Exhibit 1007. Therefore,

Exhibit 1007 is not a "duplicate" as defined by F.R.E. 1001(e) insofar as the exhibit is not "a counterpart … that accurately reproduces the original." Patent Owner also objects to Exhibit 1007 under F.R.E. 106 because the document is incomplete and includes only a select portion of a larger document that in fairness should be considered along with this document.

D. Exhibit 1029

Exhibit 1029 purports to be an article from *Bioorganic & Medicinal Chemistry Letters* by Ryabtsova, O., et al., "Acylated Gly-(2-cyano)pyrrolidines as inhibitors of fibroblast activation protein (FAP) and the issue of FAP/prolyl oligopeptidase (PREP)-selectivity." Patent Owner objects to Exhibit 1029 because it is incomplete. Petitioner did not submit the "Supplementary data" referred to on page 3417 of Exhibit 1029. Therefore, Exhibit 1029 is not a "duplicate" as defined by F.R.E. 1001(e) insofar as the exhibit is not "a counterpart … that accurately reproduces the original." Patent Owner also objects to Exhibit 1029 under F.R.E. 106 because the document is incomplete and includes only a select portion of a larger document that in fairness should be considered along with this document.

E. Exhibit 1030

Exhibit 1030 purports to be an article from *Bioconjugate Chemistry* by Eder, M., et al., "^{68}Ga-Complex Lipophilicity and the Targeting Property of a Urea-Based PSMA Inhibitor for PET Imaging." Patent Owner objects to Exhibit 1030

because it is incomplete. Petitioner did not submit the "Supporting Information" referred to on page 688 of Exhibit 1030. Therefore, Exhibit 1030 is not a "duplicate" as defined by F.R.E. 1001(e) insofar as the exhibit is not "a counterpart … that accurately reproduces the original." Patent Owner also objects to Exhibit 1030 under F.R.E. 106 because the document is incomplete and includes only a select portion of a larger document that in fairness should be considered along with this document. Patent Owner objects to Exhibit 1030 as being irrelevant under F.R.E. 401, 402, and 403 as it has not been relied upon in support of any argument made in the Petition.

F. Exhibit 1035

Exhibit 1035 purports to be an abstract from *Cancer Chemistry* by Marquis, J., et al., "Abstract #4467: Targeting tumor microenvironment with radiolabeled inhibitors of seprase (FAP\#945,)." Patent Owner objects to Exhibit 1035 under F.R.E. 901 because Petitioner has not presented evidence sufficient to support a finding that the document in question is what Petitioner claims it to be. There is no evidence that the document is self-authenticating under F.R.E. 902.

G. Exhibit 1039

Exhibit 1039 purports to be an article from *EJNMMI Radiopharmacy and Chemistry* by Nelson, B.J.B., et al., "Good Practices for ^{68}Ga Radiopharmaceutical Production." Patent Owner objects to Exhibit 1039 as being irrelevant under F.R.E.

401, 402, and 403 as it has not been relied upon in support of any argument made in the Petition.

H. Exhibit 1040

Exhibit 1040 purports to be an article from *Journal of Medicinal Chemistry* by Meyer, J.-P., et al., "Exploring Structural Parameters for Pretargeting Radioligand Optimization." Patent Owner objects to Exhibit 1040 because it is incomplete. Petitioner did not submit the "Supporting Information" referred to on page 8201 of Exhibit 1040. Therefore, Exhibit 1040 is not a "duplicate" as defined by F.R.E. 1001(e) insofar as the exhibit is not "a counterpart … that accurately reproduces the original." Patent Owner also objects to Exhibit 1040 under F.R.E. 106 because the document is incomplete and includes only a select portion of a larger document that in fairness should be considered along with this document.

I. Exhibit 1043

Exhibit 1043 purports to be an article from *Chemical Communications* by Chansaenpak, K., et al., "[^{18}F]—BF_3 adducts as water stable radio-prosthetic groups for PET imaging." Patent Owner objects to Exhibit 1043 because it is incomplete. Petitioner did not submit the "Electronic supplementary information" referred to on page 12439 of Exhibit 1043. Therefore, Exhibit 1043 is not a "duplicate" as defined by F.R.E. 1001(e) insofar as the exhibit is not "a counterpart … that accurately reproduces the original." Patent Owner also objects to Exhibit

1043 under F.R.E. 106 because the document is incomplete and includes only a select portion of a larger document that in fairness should be considered along with this document.

J. Exhibit 1045

Exhibit 1045 purports to be an article from *Small* by Ji, T., et al., "Tumor Fibroblast Specific Activation of a Hybrid Ferritin Nanocage-Based Optical Probe for Tumor Microenvironment Imaging." Patent Owner objects to Exhibit 1045 because it is incomplete. Petitioner did not submit the "Supporting Information" referred to on page 2431 of Exhibit 1045. Therefore, Exhibit 1045 is not a "duplicate" as defined by F.R.E. 1001(e) insofar as the exhibit is not "a counterpart … that accurately reproduces the original." Patent Owner also objects to Exhibit 1045 under F.R.E. 106 because the document is incomplete and includes only a select portion of a larger document that in fairness should be considered along with this document.

K. Exhibit 1047

Exhibit 1047 purports to be an article from *Journal of Medicinal Chemistry* by Tsai, T.-Y., et al., "Substituted 4-Carboxymethylpyroglutamic Acid Diamides as Potent and Selective Inhibitors of Fibroblast Activation Protein." Patent Owner objects to Exhibit 1047 because it is incomplete. Petitioner did not submit the "Supporting Information" referred to on page 6582 of Exhibit 1047. Therefore,

Exhibit 1047 is not a "duplicate" as defined by F.R.E. 1001(e) insofar as the exhibit is not "a counterpart … that accurately reproduces the original." Patent Owner also objects to Exhibit 1047 under F.R.E. 106 because the document is incomplete and includes only a select portion of a larger document that in fairness should be considered along with this document.

L. Exhibit 1048

Exhibit 1048 purports to be a publication of International Patent Application No. PCT/US2010/028020. Patent Owner objects to Exhibit 1048 as being irrelevant under F.R.E. 401, 402, and 403 as it has not been relied upon in support of any argument made in the Petition.

II. CONCLUSION

To the extent that Petitioner fails to correct the defects associated with the Challenged Evidence in view of Patent Owner's objections herein, Patent Owner may file a motion to exclude the Challenged Evidence under 37 C.F.R. § 42.64(c).

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Eldora L. Ellison/

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Date: April 6, 2026

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

I certify that the above-captioned **PATENT OWNER THE JOHNS HOPKINS UNIVERSITY'S OBJECTIONS TO EVIDENCE** was served in its entirety on April 6, 2026, upon the following parties via electronic mail:

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Respectfully submitted,

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