UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAREPTA THERAPEUTICS, INC.,

Petitioner

v.

GENZYME CORPORATION,

Patent Owner

IPR2026-00150

Patent No. 12,031,894

PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner hereby submits its notice of objections to the exhibits listed in the Table of Exhibits in Patent Owner's Response ("POR"), filed on August 5, 2026.

Exhibit No.	Objections
2001 Declaration of Katherine A. Helm	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2002 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 78 – Joint Stipulation to Amend Scheduling Order	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2003 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 59 – Notice of Service of Plaintiff's Initial Claim Charts on Infringement	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2004 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 68 – Notice of Service of Defendant's Initial Invalidity Contentions	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.

Exhibit No.	Objections
2005 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 28 - Notice of Service of Plaintiff's First Set of Requests for Production of Documents and Things	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2006 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 35 - Notice of Service of Defendant's First Set of Requests of Production of Documents and Things to Plaintiff and First Set of Interrogatories and Initial Disclosures	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2007 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 37 - Notice of Service of Plaintiff's Second Set of Interrogatories and Second Set of Requests for Production of Documents and Things	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2008 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 45 – Notice of Service of Plaintiff's First Set of Interrogatories and Third Set of Requests for Production of Documents and Things	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.

Exhibit No.	Objections
2009 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 67 - Notice of Service of Defendant's Second Set of Requests of Production of Documents and Things to Plaintiff and First Set of Interrogatories	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2010 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 83 - Notice of Service of Defendant's Amended Second Set of Requests of Production of Documents and Things to Plaintiff and First Set of Interrogatories	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2011 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 87 - Notice of Service of Defendant's Third Set of Requests of Production of Documents and Things to Plaintiff	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2012 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 91 – Notice of Service of Plaintiff's Responses to Defendants Third Set of Requests for Production of Documents and Things	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.

Exhibit No.	Objections
2013 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 92 - Notice of Service of Plaintiff's Fourth Set of Requests for Documents and Things	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2014 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 99 – Notice of Service of Plaintiff's Fifth Set of Requests for Documents and Things	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2015 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 102 – Notice of Service of Defendant's Fourth Set of Requests of Production of Documents and Things to Plaintiff	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2016 *Genzyme Corporation v. Sarepta Therapeutics Inc.* (1:24-cv-00882) D.I. 110 – Notice of Service of Plaintiff's Sixth Set of Requests for Production of Documents and Things	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2020 Collaud (2019)	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). No showing of nexus to the challenged claims.

Exhibit No.	Objections
2021 Spies (2020)	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). No showing of nexus to the challenged claims.
2022 *Novartis Gene Therapies, Inc. v. Genzyme Corp.*, IPR2023-01044, Paper 12 (Jan. 23, 2024), Patent Owner's Request for Rehearing by the Director	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2023 US 2017/0362608 ("McLaughlin")	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2024 *Novartis Gene Therapies, Inc. v. Genzyme Corp.*, IPR2023-01044, Paper 1 (Jun. 1, 2023)	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2026 Matsushita (1998)	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.

Exhibit No.	Objections
2031 Fleming Declaration	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). In particular, certain paragraphs of Exhibit 2031 are not cited or relied on in the POPR. *See, e.g.*, Ex. 2031, ¶¶ 12-15, 17-19, 27-30, 36-44, 49-51, 77-83, 103-104, 116, 120, 128, 131, 146. Thus, portions of Exhibit 2031 are irrelevant, or at least their probative value is substantially outweighed by the risk of unfair prejudice or confusing the issues. Petitioner also objects to Exhibit 2031 in its entirety as an improper extension of the word limit, under 37 CFR § 42.24(b), to the POPR.
2032 Fleming CV	Foundation (FRE 703); Hearsay (FRE 802); Authenticity (FRE 901).
2033 Carter Declaration	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). In particular, certain paragraphs of Exhibit 2033 are not cited or relied on in the POR. *See, e.g.*, Ex. 2033, ¶¶ 14-24. Thus, portions of Exhibit 2033 are irrelevant, or at least their probative value is substantially outweighed by the risk of unfair prejudice or confusing the issues. Petitioner also objects to Exhibit 2033 in its entirety as an improper extension of the word limit, under 37 CFR § 42.24(b), to the POR.

Exhibit No.	Objections
2034 Carter CV	Foundation (FRE 703); Hearsay (FRE 802); Authenticity (FRE 901).
2035 Google Scholar Results	Foundation (FRE 703); Hearsay (FRE 802); Authenticity (FRE 901). Relevance (FRE 401-402); Unfair Prejudice (FRE 403). No showing of nexus to the challenged claims.
2036 Bioanalysis (2026)	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). No showing of nexus to the challenged claims.
2037 Sigma-Aldrich (2026)	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). No showing of nexus to the challenged claims.
2038 Lipinski (2013)	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). Not cited or relied on in the POR.
2041 Kokona (2025)	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). No showing of nexus to the challenged claims.
2042 Berkowitz (2024)	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). No showing of nexus to the challenged claims.

Exhibit No.	Objections
2043 Berkowitz (2021)	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). No showing of nexus to the challenged claims.
2044 Fleming Declaration	Relevance (FRE 401-402); Unfair Prejudice (FRE 403). In particular, certain paragraphs of Exhibit 2044 are not cited or relied on in the POR. *See, e.g.*, Ex. 2044, ¶¶ 21-25, 26-29, 31-33, 37-38, 43-45, 140-149. Thus, portions of Exhibit 2044 are irrelevant, or at least their probative value is substantially outweighed by the risk of unfair prejudice or confusing the issues. Petitioner also objects to Exhibit 2044 in its entirety as an improper extension of the word limit, under 37 CFR § 42.24(b), to the POR.

For at least these reasons, Petitioner objects to Exhibits 2001-2016, 2020-2024, 2026, 2031-2038, and 2041-2044, and reserves the right to move to exclude these exhibits as inadmissible.

Respectfully submitted,

August 12, 2026

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on August 12, 2026, a complete copy of Petitioner's Objections to Evidence was provided via email to Patent Owner by serving lead and back-up counsel at the email addresses of record as follows:

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