

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Wybotics, Co. Ltd. f/k/a Tianjin Wangyuan
Environmental Protection and Technology Co., Ltd.
Petitioner

v.

Zodiac Pool Systems LLC
Patent Owner

Case No. IPR2026-00158
Patent No. 11,003,191

**PATENT OWNER'S OBJECTIONS TO EVIDENCE SUBMITTED WITH
PETITIONER'S PETITION**

Pursuant to 37 C.F.R. § 42.64(b), Patent Owner, Zodiac Pool Systems LLC (“Patent Owner”) objects as follows to the admissibility of the evidence served with Petitioner’s Petition filed on November 25, 2025.

Ex. No.	Description	Objections
1010	Declaration of Dr. Charles F. Reinholtz	37 C.F.R. § 42.65: The exhibit contains expert testimony that does not disclose the underlying facts or data on which the opinion is based. FRE 402: The exhibit includes information that is not relevant to any ground upon which trial was instituted. FRE 403: The exhibit includes information whose probative value to any ground upon which trial was instituted is substantially outweighed by the danger of unfair prejudice, confusing the issues, undue delay, wasting time, or needlessly presenting cumulative evidence. FRE 702/703 (Unreliable expert testimony): The exhibit contains statements and opinions that are not admissible under FRE 702 or 703. For example, the exhibit fails to identify facts or data supporting the witness’s conclusory testimony, and that testimony thus is not based on sufficient facts or data. Further, the testimony is not the product of reliable principles and methods, and the witness fails to reliably apply the principles and methods of the facts of the case. The exhibit contains opinions for which the factual bases have not been disclosed, including numerous broad and/or conclusory statements made without analysis or sufficient citation to evidence or explanation. <i>See also</i> Consolidated Trial Practice Guide, November 2019, at 36

		(“Expert testimony, however, cannot take the place of a disclosure in a prior art reference, when that disclosure is required as part of the unpatentability analysis.”). The exhibit may contain statements that are not Dr. Reinholtz’s opinion, as large portions of the declaration are nearly identical to the Petition. <i>See</i> Ex. 2011. FRE 802: The exhibit and statements included therein are inadmissible hearsay, and the witness has not been made available for cross-examination.
1017	SubjuGator 2011, University of Florida, RoboSub 2011 Competition Paper Submission	FRE 802: The exhibit and statements included therein are inadmissible hearsay, and the witness has not been made available for cross-examination.

Respectfully submitted,

Dated: June 1, 2026

By: /Michael Morlock/
Michael Morlock
Reg. No. 62,245
Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Patent Owner's Mandatory Notice Pursuant to 37 C.F.R. §42.8 has been served electronically via email upon the following:

Matthew W. Johnson – mwjohnson@jonesday.com
Joshua R. Nightingale – jrnightingale@jonesday.com
Adam J. Cook – acook@jonesday.com

Dated: June 1, 2026

By: /Michael Morlock/
Michael Morlock
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