

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WYBOTICS CO., LTD.
Petitioner

v.

ZODIAC POOL SYSTEMS LLC
Patent Owner

Case No. IPR2026-00160
Patent No. 11,880,207

**PETITIONER'S OBJECTIONS UNDER 37 C.F.R. § 42.64(b)(1) TO
EVIDENCE SERVED**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Wybotics Co., Ltd. submits the following objections to evidence served before institution on May 19, 2026 in the above-captioned proceeding. This notice is being timely filed within ten business days of the institution of the trial. Notwithstanding these objections, Petitioner expressly reserves the right to rely on any evidence submitted by Patent Owner, including on the ground that such evidence constitutes a party admission.

EXHIBIT	DOCUMENT	OBJECTIONS
2013	June 4, 2024, Letter from Zodiac to Wybotics	<u>FRE 401</u> Petitioner objects to this document as being irrelevant. <u>FRE 901</u> Petitioner objects to this document as not being properly authenticated.
2014	Application Proof of Wybotics Co., Ltd.	<u>FRE 401</u> Petitioner objects to this document as being irrelevant. <u>FRE 901</u> Petitioner objects to this document as not being properly authenticated.

Dated: May 29, 2026

Respectfully submitted,

/Joshua R. Nightingale/

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Petitioner's Objections Under 37 C.F.R. § 42.64(b)(1) to Evidence Served in the *inter partes* review of U.S. Patent No. 11,880,207, Case No. IPR2026-00160, was served on May 29, 2026 via email on Michael Morlock (Reg. No. 62,245), Lead Counsel for Patent Owner, at mmorlock@ktslaw.com, and Christopher Leah (Reg. No. 76,388), Backup Counsel for Patent Owner, at cleah@ktslaw.com.

Date: May 29, 2026

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