

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ALLIANCE LAUNDRY SYSTEMS, LLC,
Petitioner,

v.

PAYRANGE LLC,
Patent Owner.

PGR2025-00027
U.S. Patent No. 11,966,920

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

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner submits these Objections to Evidence with respect to evidence submitted by Patent Owner accompanying Patent Owner's Response to the Petition for Post-Grant Review of U.S. Patent No. 11,966,920 ("Patent Owner Response," Paper 17). These objections are timely filed within five business days of service, as required by the rule. Petitioner reserves the right to present further objections to this or additional evidence submitted by Patent Owner, as allowed by the applicable rules or other authority, including without limitation, upon conclusion of cross-examination of Patent Owner's declarants.

II. IDENTIFICATION OF CHALLENGED EVIDENCE AND GROUNDS FOR OBJECTIONS

A. Objections to Specific Evidence

Petitioner objects to Exhibit Nos. 2008, 2010, and 2013, and any reference to or reliance on these exhibits, under the Federal Rules of Evidence (FRE) as described below.

1. Exhibit No. 2008 ("Dr. Miller Declaration") is objectionable on the following grounds:

FRE 1001–1008: Requirement of the Original for at least the following reasons. Dr. Miller's claim construction opinion relies on a quote from a book titled "The Psychology of Everyday Things" without providing a copy of the book. This omission fails to satisfy the requirement of the original.

2. Exhibit No. 2010 (“Dr. Neuman Deposition Transcript, November 4, 2025”) is objectionable on the following grounds:

FRE 401–403: General Admissibility of Relevant Evidence for at least the following reasons. During the deposition of Dr. Neuman, Patent Owner questioned Dr. Neuman about material outside the scope of his direct testimony.

FRE 801–803: Hearsay for at least the following reasons. During the deposition of Dr. Neuman, Patent Owner provided out-of-court statements offered to prove the truth of the matter asserted that Patent Owner now seeks to rely upon in its Patent Owner Response.

3. Exhibit No. 2013 (“Applicability of Affordance Concept in User-Computer Interaction” Publication) is objectionable on the following grounds:

FRE 901–903: Authentication for at least the following reasons. This exhibit purports to be a publication titled “Applicability of Affordance Concept in User-Computer Interaction” that was purportedly downloaded by Patent Owner on November 24, 2025. Patent Owner represents that this publication was first publicly available in December 2012, but the exhibit is not accompanied by sufficient evidence to support a finding that the exhibit was publicly available as of December 2012. The exhibit is therefore objected to for lack of authentication.

III. CONCLUSION

For at least the foregoing reasons, Petitioner objects to Exhibit Nos. 2008, 2010, and 2013.

Respectfully submitted,

Dated: December 12, 2025

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(a), I hereby certify that on December 12, 2025, I caused a complete copy of Petitioner's Objections to Evidence Submitted with Patent Owner's Response to be served on the Patent Owner of the subject Patent as follows:

By email to the Patent Owner's attorneys of record:

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Dated: December 12, 2025

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