

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 PGR2025-00059
U.S. Patent No. 12,115,233

PATENT OWNER'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

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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, 1030, 1031, 1035, 1039, and 1048 (the “Challenged Evidence”), filed by Petitioner GE Healthcare Ltd. (“Petitioner”) on July 14, 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 January 14, 2026 Institution Decision (Paper 8). 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 1-11, 16-26, 29-32, 54, 56, 60-62, 73, 74, 76-79, 82, 84, 90, 97-100, 102, 107, 109, 125, 129-131, 139, 165, 170, 172, 173, 177, 180, 181, 191, 200, 203, 206, 208-210, 218-220, 222, 240, 241, 244, 247, 258-260, 262-265, 267-269, 271-274, 280, 287-289, 291, 296, and 299-302 of Exhibit 1003 under F.R.E. 402 and 403. Petitioner does not rely on or even 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 1030

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

C. Exhibit 1031

Exhibit 1031 purports to be excerpts of the file history of U.S. 11,938,201 (“the ’201 patent”). Patent Owner objects to Exhibit 1031 because it is incomplete. Petitioner has not submitted the complete file history for the ’201 patent. Therefore, Exhibit 1031 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 1031 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 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.

E. Exhibit 1039

Exhibit 1039 purports to be an article from *EJNMMI Radiopharmacy and Chemistry* by Nelson, B.J.B., et al., “Good Practices for ⁶⁸Ga 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.

F. 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

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

I certify that the above-captioned **PATENT OWNER'S OBJECTIONS TO EVIDENCE** was served in its entirety on January 29, 2026, upon the following parties via electronic mail:

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