Paper No. 13
Filed: April 15, 2026

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GE Healthcare Ltd.,
Petitioner,

v.

Johns Hopkins University,
Patent Owner.

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

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# PETITIONER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner GE Healthcare hereby submits objections to evidence served by Patent Owner Johns Hopkins University on April 8, 2026 in support of its Patent Owner Response (Paper 12). The discussion below identifies the evidence to which GE Healthcare objects and summarizes GE Healthcare's objections, including the Federal Rules of Evidence ("FRE") that form the basis for the objections.

**1. Exhibit 2003**

Petitioner GE Healthcare objects to Exhibit 2003 under FRE 1002 and 1003 as being an incomplete document. EX2003 refers to supplementary information, which is not provided in EX2003. *See, e.g.*, EX2003 at 1700. EX2003 is therefore not an original under FRE 1002 or a duplicate under FRE 1003.

**2. Exhibit 2011**

Petitioner GE Healthcare objects to Exhibit 2011 under FRE 401-403 because it is not prior art to the '233 Patent. Exhibit 2011 purports to have published in April 2021 and therefore lacks relevance to a POSA's knowledge and understanding before the '233 Patent's claimed 2017 priority date. Exhibit 2011 is therefore not relevant to any issue in this proceeding, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder.

GE Healthcare also objects to EX2011 under FRE 1002 and 1003 as being an incomplete document. EX2011 refers to supporting information and supplementary material, which is not provided in EX2011. *See, e.g.*, EX2011 at 1, 15. EX2011 is therefore not an original under FRE 1002 or a duplicate under FRE 1003.

**3. Exhibit 2018**

Petitioner GE Healthcare objects to EX2018 under FRE 401-403 as being irrelevant because EX2018 has not been relied upon in support of any argument made in the Patent Owner Response.

**4. Exhibit 2021**

Petitioner GE Healthcare objects to EX2021 to the extent it consists of pages from EX1006 that were marked, annotated, highlighted, labeled, or otherwise altered during the deposition of Dr. Zeglis. EX2021 is not the prior art reference itself, but a litigation-created demonstrative reflecting Johns Hopkins University counsel's selections, framing, and annotations based on their instructions. GE Healthcare objects under FRE 901 because Johns Hopkins University has not established that the marked-up exhibit is what Johns Hopkins University appears to contend it is—namely, an accurate and reliable depiction of what the underlying reference teaches.

GE Healthcare also objects to Exhibit 2021 under FRE 1002 and 1003 as being an incomplete document because the counsel-directed annotations lack the context of Dr. Zeglis's contemporaneous testimony and the remaining pages of the reference.

GE Healthcare further objects under FRE 106 because EX2021 consists of selected excerpts rather than the complete reference or complete relevant portions thereof.

GE Healthcare further objects under FRE 403 because any marginal relevance of the annotated exhibit is substantially outweighed by the danger of unfair prejudice, misleading the Board, and confusing the issues, including by embedding attorney argument and selective emphasis into the face of the exhibit.

GE Healthcare also objects to EX2021 under FRE 401-403 as being irrelevant because EX2021 has not been relied upon in support of any argument made in the Patent Owner Response.

**5. Exhibit 2022**

Petitioner GE Healthcare objects to EX2022 to the extent it consists of pages from EX1006 that were marked, annotated, highlighted, labeled, or otherwise altered during the deposition of Dr. Zeglis. EX2022 is not the prior art reference itself, but a litigation-created demonstrative reflecting Johns Hopkins University counsel's selections, framing, and annotations based on their instructions. GE

Healthcare objects under FRE 901 because Johns Hopkins University has not established that the marked-up exhibit is what Johns Hopkins University appears to contend it is—namely, an accurate and reliable depiction of what the underlying reference teaches.

GE Healthcare also objects to Exhibit 2022 under FRE 1002 and 1003 as being an incomplete document because the counsel-directed annotations lack the context of Dr. Zeglis's contemporaneous testimony and the remaining pages of the reference.

GE Healthcare further objects under FRE 106 because EX2022 consists of selected excerpts rather than the complete reference or complete relevant portions thereof.

GE Healthcare further objects under FRE 403 because any marginal relevance of the annotated exhibit is substantially outweighed by the danger of unfair prejudice, misleading the Board, and confusing the issues, including by embedding attorney argument and selective emphasis into the face of the exhibit.

GE Healthcare also objects to EX2022 under FRE 401-403 as being irrelevant because EX2022 has not been relied upon in support of any argument made in the Patent Owner Response.

**6. Exhibit 2024**

Petitioner GE Healthcare objects to EX2024 under FRE 401-403 as being irrelevant because EX2024 has not been relied upon in support of any argument made in the Patent Owner Response.

**7. Exhibit 2027**

Petitioner GE Healthcare objects to EX2027 under FRE 401-403 as being irrelevant because EX2027 has not been relied upon in support of any argument made in the Patent Owner Response.

**8. Exhibit 2034**

Petitioner GE Healthcare objects to EX2034 under FRE 401-403 as being irrelevant because EX2034 has not been relied upon in support of any argument made in the Patent Owner Response.

**9. Exhibit 2043**

Petitioner GE Healthcare objects to Exhibit 2043 under FRE 401-403 because it is not prior art to the ’233 Patent. Exhibit 2043 purports to have published in April 2025 and therefore lacks relevance to a POSA’s knowledge and understanding before the ’233 Patent’s claimed 2017 priority date. Exhibit 2043 is therefore not relevant to any issue in this proceeding, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder.

GE Healthcare also objects to EX2043 under FRE 401-403 as being irrelevant because EX2043 has not been relied upon in support of any argument made in the Patent Owner Response.

**10. Exhibit 2044**

Petitioner GE Healthcare objects to Exhibit 2044 under FRE 401-403 because it is not prior art to the '233 Patent. Exhibit 2044 purports to have published in August 2021 and therefore lacks relevance to a POSA's knowledge and understanding before the '233 Patent's claimed 2017 priority date. Exhibit 2044 is therefore not relevant to any issue in this proceeding, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder.

**11. Exhibit 2045**

Petitioner GE Healthcare objects to Exhibit 2045 under FRE 401-403 because it is not prior art to the '233 Patent. Exhibit 2045 purports to have published in 2020 and therefore lacks relevance to a POSA's knowledge and understanding before the '233 Patent's claimed 2017 priority date. Exhibit 2045 is therefore not relevant to any issue in this proceeding, and any relevance is outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder.

GE Healthcare also objects to EX2045 under FRE 401-403 as being irrelevant because EX2045 has not been relied upon in support of any argument made in the Patent Owner Response.

**12. Exhibit 2046**

Petitioner GE Healthcare objects to EX2046 under FRE 401-403 as being irrelevant because EX2046 has not been relied upon in support of any argument made in the Patent Owner Response.

**13. Exhibit 2047**

Petitioner GE Healthcare objects to EX2047 under FRE 401-403 as being irrelevant because EX2046 has not been relied upon in support of any argument made in the Patent Owner Response.

**14. Exhibit 2048**

Petitioner GE Healthcare objects to EX2048 under FRE 401-403 as being irrelevant because EX2046 has not been relied upon in support of any argument made in the Patent Owner Response.

**15. Exhibit 2050**

Petitioner GE Healthcare objects to Exhibit 2050 under FRE 401-403 because it is not prior art to the ’233 Patent. Exhibit 2050 purports to have published in January 2022 and therefore lacks relevance to a POSA’s knowledge and understanding before the ’233 Patent’s claimed 2017 priority date. Exhibit 2050 is therefore not relevant to any issue in this proceeding, and any relevance is

outweighed by the risks of confusion, substantial danger of unfair prejudice, and/or misleading the fact finder.

**16. Exhibit 2053**

Petitioner GE Healthcare objects to EX2053 under FRE 401-403 as being irrelevant because EX2053 has not been relied upon in support of any argument made in the Patent Owner Response.

**17. Exhibit 2057**

Petitioner GE Healthcare objects to EX2057 under FRE 401-403 as being irrelevant because EX2057 has not been relied upon in support of any argument made in the Patent Owner Response.

Dated: April 15, 2026

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), I hereby certify that on this 15th day of April, 2026, I caused to be served a true and correct copy of the foregoing and any accompanying exhibits by electronic mail on the following counsel:

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