

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NICHOLSON MANUFACTURING LTD.,

Petitioner

v.

BID GROUP TECHNOLOGIES LTD.,

Patent Owner

Case PGR2025-00081

US Patent No. 12,163,947

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S EXHIBIT LIST
AND EXPERT REPORTS**

EXHIBITS AND OBJECTIONS

Exhibit #	Objection
1002	<p data-bbox="396 344 1429 470">37 C.F.R. §§ 42.24(a) and 42.6(a)(3): All Paragraphs which Petitioner attempted to improperly incorporate into other declarations and the Petition.</p> <p data-bbox="396 554 1429 1184"><u>FRE 702, 703, 37 C.F.R. §§ 42.65(a) and (b)</u> ¶¶ 12, 25-27, 28-36, 37-48, 50-56, 63-68, 69-73, 75-81, 82-92, 93, 95, 96-99, 100-105, 106-107, 108-111, 112-114, 115-118, 119, 123, 124, 127, 128, 130, 131, 132, 136-137, 138, 139, 140, 141, 142-143, 144, 145, 146, 147, 149-150, 151, 152, 153-163, 164-167, 168-173, 174, 175-180, 182-185, 187-191, 198-204, 205, 206, 207-209, 210-212, 213, 219, 220-222, 223, 224-229, 231-233, 235, 236, 241, 242-243, 246, 248, 250, 252, 254, 256, 258, 259, 260, 261-262, 263-264, 265-268, 269, 270, 282, 283-285, 286-288, 289, 294, 295, 296, 297-299, 300-302, 305, 310, 311, 314, 327, 328-337, 338-342, 343, 344-347. These are not based on sufficient facts or data, do not disclose underlying facts or data, rely on documents and exhibits not before the Patent Trial and Appeal Board, do not sufficiently explain the test or data in accordance with 42.65(b), and/or are not the product of reliable scientific principles and methods.</p> <p data-bbox="396 1268 1429 1583"><u>FRE 602, 701, 702, 703, 802:</u> ¶¶ 29-36, 63-67, 70-73, 75-81, 100-105, 107, 111, 112-114, 128-130, 147, 157, 159-163, 164-167, 168-173, 180, 185, 191, 196, 217-219, 223, 225-228, 233, 237, 240, 241, 242-243, 261-262, 263-264, 265-268, 273, 276, 279, 289, 294, 295, 298-299, 301-302, 309, 310, 328-337, 338-342, and 344-347, are not based any qualified expert's testimony, not based on personal knowledge, rely on or contain hearsay, and are improper lay witness opinion testimony.</p> <p data-bbox="396 1667 1429 1866"><u>FRE 402, 403:</u> All paragraphs, which relate to patents not involved in this proceeding and additionally ¶¶ 1-3, 10, 29, 32, 36, 37-48, 100, 104-105, 107, 109, 111, 123, 124, 126, 237, 306. These are not relevant; to the extent they are relevant, their probative value is outweighed by</p>

Exhibit #	Objection
	the danger of causing unfair prejudice and confusing the issues because they improperly characterize a document or general knowledge.
1008	FRE 106, 402, 403 This is not the operative Complaint and is not referenced or relied upon in the Petition, declarations, or other exhibits.
1009	FRE 106, 402, 403 This is not the operative Complaint and is not referenced or relied upon in the Petition, declarations, or other exhibits.
1010	FRE 106, 402, 403 This is not the operative Complaint and is not referenced or relied upon in the Petition, declarations, or other exhibits.
1011	FRE 106, 402, 403 This is not the operative Complaint and is not referenced or relied upon in the Petition, declarations, or other exhibits.
1012	FRE 106, 402, 403 This is not the operative Complaint and is not referenced or relied upon in the Petition, declarations, or other exhibits.
1013	FRE 106, 402, 403
1014	FRE 106, 402, 403
1015	FRE 106, 402, 403
1016	FRE 106, 402, 403
1017	FRE 106, 402, 403
1018	FRE 106, 402, 403

Dated: March 4, 2026

Respectfully submitted,

/R. Scott Johnson/

R. Scott Johnson

Reg. No. 45,792

*Counsel for Patent Owner Bid Group
Technologies Ltd.*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e) and the agreement of the parties, the undersigned certifies that on March 4, 2026, a true and correct copy of the foregoing Patent Owner's Objections to Petitioner's Exhibit List and Expert Reports Pursuant to 37 C.F.R. § 42.8 was served via electronic mail upon the following:

Jeffrey Danley
Steven Lawrenz
Bilal Adra
SEED INTELLECTUAL PROPERTY LAW GROUP LLP
701 Fifth Avenue, Suite 5400
Seattle, WA 98104
Telephone: (206) 622-4900
Jeff.Danley@SeedIP.com
SteveL@SeedIP.com
BilalA@SeedIP.com
LitStaff@SeedIP.com

Dated: March 4, 2026

/R. Scott Johnson/

R. Scott Johnson
Reg. No. 45,792

*Counsel for Patent Owner Bid Group
Technologies Ltd.*