

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BICARA THERAPEUTICS, INC.,

Petitioner

v.

THE JOHNS HOPKINS UNIVERSITY,

Patent Owner.

PGR2026-00025

U.S. Patent No. 12,295,968

**PATENT OWNER'S OBJECTIONS TO PRELIMINARY EVIDENCE
SUBMITTED BY PETITIONER**

Patent Owner's Objections to Evidence

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner The Johns Hopkins University ("Patent Owner") respectfully submits the following objections to the preliminary evidence submitted with the Petition for Post Grant Review ("Petition") of Bicara Therapeutics, Inc. ("Petitioner"), filed February 10, 2026, and any other preliminary submissions, including Exhibits 1001–1095 and Exhibits 1096–1109. These objections are filed within 10 days of the Board's institution of this post grant review, and therefore timely under 37 C.F.R. § 42.64.

The Board has not issued an order discussing Petitioner's challenges or the substance of Petitioner's purported evidence following its institution of this post grant review. Patent Owner reserves the right to further object to any exhibit as lacking relevance, and to supplement or amend these objections as appropriate.

Patent Owner's citation to, or discussion of, any exhibit identified below in its Preliminary Response does not waive, and is without prejudice to, the objections asserted herein. Patent Owner's objections also apply equally to Petitioner's reliance on or citation to any objected-to exhibit in any of its papers, including expert declarations and briefing.

Exhibit	Description	Objection(s)
1001–1002	Challenged patent and its file history	No objection asserted at this time.

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Exhibit	Description	Objection(s)
1005–1019; 1045	Related patents and file histories	FRE 401–403: Irrelevant to the extent not tied to any ground on which the Board instituted review. Further irrelevant as evidenced by the lack of citation to any of these Exhibits in Dr. Hale's analysis as contained in his Declaration (Exhibit 1003). In fact, Dr. Hale exclusively cites to Exhibits 1001 and 1002—i.e., the challenged patent and its file history. Patent Owner's Petition likewise does not cite any of these Exhibits, with the sole exception of Exhibit 1005 which is cited but not discussed in Section II on Grounds for Standing.
1003	Expert Declaration of Geoffrey Hale, Ph.D., in Support of the Petition	FRE 401–403: Irrelevant to the extent it relies on or addresses grounds beyond those on which the Board instituted review. This includes Paragraphs 15–37 containing Dr. Hale's recitation of his understanding of legal standards. FRE 702–703: Insufficient qualification and/or insufficient factual or data support for the opinions offered as to Paragraphs 38–204, inclusive of headings, cited exhibits, and footnotes. FRE 602: Lacks foundation/personal knowledge and/or speculative as to certain statements to be further determined pending discovery.

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Exhibit	Description	Objection(s)
		FRE 801–803: Hearsay to the extent Petitioner intends to rely on the declaration for the truth of matters asserted rather than as live testimony. 37 C.F.R. § 42.65(a): Opinion testimony that does not disclose underlying facts or data is entitled to little or no weight as to Paragraphs 38–204, inclusive of headings, cited exhibits, and footnotes.
1004	Curriculum Vitae of Geoffrey Hale, Ph.D.	FRE 401–403: Irrelevant to the extent offered beyond establishing the witness's background. FRE 801–803: Hearsay to the extent offered for the truth of matters asserted therein rather than as a foundation for testimony.
1020–1040	Sequence listing files (XML/TXT) submitted as supplemental content on Patent Center for applications relating to the challenged patent	FRE 401–403: Irrelevant to the extent not tied to any ground on which the Board instituted review. Further irrelevant as evidenced by the lack of citation to any of these Exhibits in Dr. Hale's analysis as contained in his Declaration (Exhibit 1003). In fact, Dr. Hale exclusively cites to Exhibits 1001 and 1002—i.e., the challenged patent and its file history. Patent Owner's Petition likewise does not cite any of these Exhibits. FRE 901: Lack of authenticating evidence sufficient to show each file

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Exhibit	Description	Objection(s)
		is part of its respective identified patent application, as purported. FRE 801–803: Hearsay to the extent offered for the truth of the matter asserted, including as to purported filing, loading, or production dates.
1041–1043	37 C.F.R. § 1.57 (versions from 2007–2015)	No objection asserted at this time.
1044	Dr. Atul Bedi's April 17, 2025 Declaration Under 37 C.F.R. § 1.132, from the file history of U.S. Patent Application No. 18/811,627	FRE 401–403: Irrelevant because the exhibit is drawn from the file history of an application outside the challenged patent's alleged priority chain and family; no shown nexus to any instituted ground. Further irrelevant as evidenced by the lack of citation to this Exhibit in Dr. Hale's analysis as contained in his Declaration (Exhibit 1003). In fact, Dr. Hale exclusively cites to Exhibits 1001 and 1002—i.e., the challenged patent and its file history. FRE 801–803: Hearsay to the extent Petitioner intends to rely on the declaration for the truth of the matters asserted rather than as live testimony.
1046–1095	Technical and scientific publications	FRE 401–403: Irrelevant to the extent not tied to any ground on which the Board instituted review. Further irrelevant as evidenced by the lack of citation to any of these Exhibits in Dr. Hale's analysis as

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Exhibit	Description	Objection(s)
		contained in his Declaration (Exhibit 1003). In fact, Dr. Hale exclusively cites to Exhibits 1001 and 1002—i.e., the challenged patent and its file history. Patent Owner's Petition likewise does not cite any of these Exhibits. FRE 901: Lack of authenticating evidence sufficient to show each exhibit is what it purports to be, including as to purported URL, publication date, and public accessibility. FRE 801–803: Hearsay to the extent offered for the truth of the matter asserted, including as to alleged publication date or public availability.
1096–1097; 1099–1109	Biocon, Bicara, and Y-Trap documents submitted with Petitioner's Opposition to Patent Owner's Request for Discretionary Denial	FRE 401–403: Irrelevant to the extent not tied to any ground on which the Board instituted review. FRE 901: Lack of authenticating evidence sufficient to show each exhibit is what it purports to be.
1098	Declaration of Ryan Cohlhepp, Pharm.D.	FRE 401–403: Irrelevant to the extent not tied to any ground on which the Board instituted review. FRE 801–803: Hearsay to the extent Petitioner intends to rely on the declaration for the truth of the matters asserted rather than as live testimony.

July 28, 2026

Respectfully submitted,

/Jennifer Librach Nall/

Jennifer Librach Nall

Reg. No. 57,053

Attorney for Patent Owner

The Johns Hopkins University

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that on July 28, 2026, I caused a true and correct copy of the forgoing PATENT OWNER'S OBJECTIONS TO PRELIMINARY EVIDENCE SUBMITTED BY PETITIONER to be served electronically on Petitioner's lead and back-up counsel at the following addresses:

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Dated: July 28, 2026

/Jennifer Librach Nall/
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