

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
Patent 12,295,968

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

Pursuant to 37 C.F.R. § 42.64(b)(1) and the Federal Rules of Evidence (“FRE”), Petitioner Bicara Therapeutics, Inc. (“Bicara” or “Petitioner”) objects to the admissibility of the following evidence filed by Patent Owner The Johns Hopkins University (“JHU” or “Patent Owner”) with its Patent Owner’s Preliminary Response.

Petitioner’s objections are timely under 37 C.F.R. § 42.64(b)(1) because they are being filed and served within ten business days of the Institution Decision. *See* PGR2026-00025 at Paper 10. These objections provide notice to Patent Owner that Petitioner may move to exclude the exhibits identified below as inadmissible under 37 C.F.R. § 42.64(c).

1. Exhibits 2001, 2002, 2005, 2009, and 2012–2017

Petitioner objects to Exhibits 2001, 2002, 2005, 2009, and 2012–2017 under FRE 401 and FRE 402 as irrelevant. The subject matter of these exhibits is not relevant to the § 112 grounds at issue in the Petition.

Petitioner further objects to these exhibits under FRE 403 because any probative value is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence.

Petitioner further objects to Exhibit 2005 under FRE 901 for lack of authentication because there is no evidence establishing that the transcript is a fair

and accurate reproduction of the purported interview or that the recording is what it is claimed to be.

Petitioner further objects to Exhibit 2005 under FRE 802 as inadmissible hearsay, and not within any hearsay exception.

2. Exhibit 2024

Petitioner objects to Exhibit 2024, a database listing of purported grants awarded to Dr. Atul Bedi, under FRE 802 as inadmissible hearsay, and not within any hearsay exception.

Petitioner further objects to Exhibit 2024 under FRE 401–403 because it is not relevant to any issue in this proceeding and because any probative value is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence.

3. Exhibits 2006, 2015, 2033, and 2034

Petitioner objects to Exhibits 2006, 2015, 2033, and 2034 under FRE 106 because each is an incomplete document that omits portions that in fairness ought to be considered together with the part offered. Each of the documents indicates that pages have been omitted.

Petitioner further objects to Exhibits 2006, 2015, 2033, and 2034 under FRE 1002 and FRE 1003 because the exhibits do not constitute complete or original

documents, and under FRE 401–403 because, in their incomplete form, any probative value is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence.

4. Exhibit 2023

Petitioner objects to Exhibit 2023, a third-party company profile, under FRE 802 as inadmissible hearsay, and not within any hearsay exception. Petitioner further objects to Exhibit 2023 under FRE 401–403 because it is not relevant to any issue in this proceeding and because any probative value is substantially outweighed by the danger of unfair prejudice, confusing the issues, wasting time, or needlessly presenting cumulative evidence.

5. Exhibits 2025 and 2029

The relevance of these exhibits depends on the disputed effective filing date of the '968 Patent, which Petitioner contends is no earlier than September 12, 2024, and Patent Owner contends is at least March 4, 2011. *See* PGR2026-00025, Paper 8 at 19–21. Further, Patent Owner purports to reserve its rights to address “Petitioner’s arguments concerning the provisional applications” to which the '968 Patent purports to claim priority, providing an earliest potential disputed effective filing date of March 5, 2010. *Id.* To the extent Patent Owner prevails in establishing an effective filing date of March 5, 2010, Exhibits 2025 and 2029 were published

after the disputed earliest filing date of the '968 Patent and therefore cannot provide any information as to the knowledge of a person of ordinary skill in the art or the state of the art as of the date of the patent.

Petitioner objects to Exhibits 2025 and 2029 under FRE 401–403 to the extent these exhibits are relied upon for invalidity purposes or to establish the knowledge of a person of ordinary skill in the art and to the extent these articles were published after the effective filing date to which the challenged claims are entitled.

Dated: July 28, 2026

Respectfully Submitted,

/Linnea P. Cipriano/
Linnea P. Cipriano
Reg. No. 67,729
GOODWIN PROCTER LLP
620 Eighth Avenue
New York, NY 10018
LCipriano@goodwinlaw.com
212-459-7258

Daryl L. Wiesen
Pro Hac Vice Forthcoming
Christie Larochele
Reg No. 75,020
Thomas V. McTigue IV
Reg. No. 75,419
GOODWIN PROCTER LLP
100 Northern Avenue
Boston, MA 02210

*Counsel for Petitioner Bicara
Therapeutics, Inc.*

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.64, I hereby certify that on the date set forth below, a true and correct copy of the foregoing **PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE SUBMITTED WITH PATENT OWNER'S PRELIMINARY RESPONSE** was served by electronic mail, by agreement of the parties, upon Patent Owner's counsel of record to the following addresses:

Jennifer Librach Nall
(Reg. No. 57053)
jennifer.nall.ptab@us.dlapiper.com
DLA Piper LLP (US)
303 Colorado Street
Suite 3000
Austin, TX 78701
Phone: (512) 457-7249
Facsimile: (512) 721-2249

Pamela E. Hwang
(Reg. No. 54984)
pamela.hwang@us.dlapiper.com
DLA Piper LLP (US)
4625 Executive Drive, Suite 1100
San Diego, CA 92121-2133
Telephone: (858) 677-1473
Facsimile: (858) 677-1401

Lisa A. Haile
(Reg. No. 38347)
Lisa.haile@us.dlapiper.com
DLA Piper LLP (US)
4625 Executive Drive, Suite 1100
San Diego, CA 92121-2133
Telephone: (858) 677-1456
Facsimile: (858) 677-1401

James M. Heintz
Reg. No. 41,828
jim.heintz@us.dlapiper.com
DLA Piper LLP (US)
One Fountain Square
11911 Freedom Drive, Suite 300
Reston, VA 20190-5602
Phone: (703) 773-4000
Facsimile: (703) 773-5000
jim.heintz@us.dlapiper.com

DLA-JHU-Bicara-PGR@us.dlapiper.com

Dated: July 28, 2026

/Linnea P. Cipriano/
Linnea P. Cipriano
Reg. No. 67,729
GOODWIN PROCTER LLP
620 Eighth Avenue
New York, NY 10018
LCipriano@goodwinlaw.com
212-459-7258

*Counsel for Petitioner Bicara
Therapeutics, Inc.*