

Filed on behalf of:

Patent Owner

By: Nicholas J. Gallo (Lead Counsel)

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Paper No. _____

Date: October 5, 2026

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ENTEGRIS, INC.,
Petitioner,

v.

GUDENG PRECISION INDUSTRIAL CO., LTD.,
Patent Owner.

PGR2026-00037
Patent 12,347,711

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), and within the time period set forth therein, Patent Owner Gudeng Precision Industrial Co., Ltd. ("Patent Owner"), hereby submits the following objections to certain evidence submitted by Petitioner Entegris, Inc. ("Petitioner"), with the Petition for Post Grant Review of U.S. Patent No. 12,347,711 (Paper 1) ("Petition") filed on March 31, 2026.

Patent Owner reserves the right to present further objections to this, or additional evidence submitted by Petitioner, as allowed by the applicable rules or other authority, including without limitation upon conclusion of cross-examination of Petitioner's declarants.

1. Exhibit 1002 (File History of U.S. Patent No. 12,347,711 (Application No. 17/882,703))

Patent Owner objects to Exhibit 1002 under 37 CFR § 42.63(b), which states the translation requirement for evidence submitted in Patent Trial and Appeal Board ("PTAB") proceedings. The requirement states that "when a party relies on a document or is required to produce a document in a language other than English, a translation of the document into English and an affidavit attesting to the accuracy of the translation must be filed with the document." The referenced exhibit is, in substantial part, in Chinese and/or Japanese. The exhibit, as presented, does not contain the required filings of translations into English nor an affidavit attesting to the accuracy of a translation. As a result, the exhibit is inadmissible.

Patent Owner further objects to Exhibit 1002 under Fed. R. Evid. 401, 402, 403, and 901. For example, the exhibit is otherwise misleading or confusing, and its probative value, if any, is outweighed by prejudice. The exhibit has also not been properly authenticated.

2. Exhibit 1004 (U.S. Provisional Application No. 63/284,105)

Patent Owner objects to Exhibit 1004 under Fed. R. Evid. 401, 402, 403, 901, 1002, 1003, and 1005. The referenced exhibit is not what it purports to be. The exhibit is stated in the Petition to be U.S. Provisional Application No. 63/284,105. The exhibit, as presented, is U.S. Provisional Application No. 63/316,391. As a result, the exhibit is inadmissible. For example, the exhibit is otherwise misleading or confusing, and its probative value, if any, is outweighed by prejudice. The exhibit has also not been properly authenticated.

3. Exhibit 1014 (Taiwanese Patent No. TW I606534)

Patent Owner objects to Exhibit 1014 under 37 CFR § 42.63(b), which states the translation requirement for evidence submitted in PTAB proceedings. The requirement states that “when a party relies on a document or is required to produce a document in a language other than English, a translation of the document into English and an affidavit attesting to the accuracy of the translation must be filed with the document.” The exhibit, as presented, does not contain the

required filings of a translation of the document into English nor an affidavit attesting to the accuracy of the translation. As a result, the exhibit is inadmissible.

Patent Owner further objects to Exhibit 1014 under Fed. R. Evid. 401, 402, 403, and 901. For example, the exhibit is otherwise misleading or confusing, and its probative value, if any, is outweighed by prejudice. The exhibit has also not been properly authenticated.

4. Exhibit 1015 (Machine Translation of Taiwanese Patent No. TW I606534)

Patent Owner objects to Exhibit 1015 under 37 CFR § 42.63(b), which states the translation requirement for evidence submitted in PTAB proceedings. The requirement states that “when a party relies on a document or is required to produce a document in a language other than English, a translation of the document into English and an affidavit attesting to the accuracy of the translation must be filed with the document.” The referenced exhibit purports to be a translation of Exhibit 1014, yet there is no affidavit attesting to the accuracy of the translation accompanying Exhibit 1014. The exhibit, as presented, does not contain the required filing of an affidavit attesting to the accuracy of the translation. As a result, the exhibit is inadmissible.

Patent Owner further objects to Exhibit 1015 under Fed. R. Evid. 401, 402, 403, and 901. For example, the exhibit is otherwise misleading or confusing, and

its probative value, if any, is outweighed by prejudice. The exhibit has also not been properly authenticated.

5. Exhibit 1018 (Viktrex, Viktrex Peek 150G/151G)

Patent Owner objects to Exhibit 1018 under Fed. R. Evid. 401, 402, 403, 901, 1002, 1003, and 1005. The referenced exhibit does not have an accompanying declaration as to the authenticity of the URL and related archived file. As a result, the exhibit is inadmissible. For example, the exhibit is otherwise misleading or confusing, and its probative value, if any, is outweighed by prejudice.

6. Exhibit 1019 (Viktrex, Product Summary)

Patent Owner objects to Exhibit 1019 under Fed. R. Evid. 401, 402, 403, 901, 1002, 1003, and 1005. The referenced exhibit does not have an accompanying declaration as to the authenticity of the URL and related archived file. As a result, the exhibit is inadmissible. For example, the exhibit is otherwise misleading or confusing, and its probative value, if any, is outweighed by prejudice.

7. Exhibit 1006 (Declaration of Dr. Alexander Glew)

Patent Owner objects to specific paragraphs in Exhibit 1006 (Declaration of Dr. Alexander Glew), and any argument or testimony purporting to rely on paragraphs of Exhibit 1006 identified below, as detailed below using the following codes:

- R = Fed. R. Evid. 401, 402, 403 (Relevance; testimony on United States patent law or patent examination practice not admissible under 37 C.F.R. § 42.65(a); probative value outweighed by prejudice, confusing or misleading, cumulative, or duplicative)
- K = Fed. R. Evid. 602, 901, 1002, 1003, 1005, 1006 (Lack of personal knowledge; no foundation; inaccurate description)
- H = Fed. R. Evid. 801, 802, 805 (Hearsay)
- O = Fed. R. Evid. 701 (Improper opinion testimony)
- B = Fed. R. Evid. 702/703 (Bases/Reliability of an Expert's Opinion

Testimony; speculative; relies on improper principles and/or methodologies)

Exhibit 1006 (Paragraph(s))	Objections(s)
7-9	B, K, O, H, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered. The referenced paragraphs also contain statements that are inaccurate characterizations of references cited by the declarant.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements

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	inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [H] (The referenced paragraphs contain out-of-court statements made by one or more declarants for the purpose of proving the truth of the matter asserted. To the extent the declaration relies on the assertions of others, this amounts to hearsay within hearsay.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)
10	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are

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12-31	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)
32-34	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions

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35-36	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered

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37-55	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)

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56-75	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)
76-94	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules,

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95-97	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony,

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98-127	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)
128-137	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the

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138-152	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are

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153-157	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)
158-163	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions

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164-177	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered

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178-202	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)

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203-218	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)
219-239	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules,

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240-245	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony,

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246-258	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)
259-262	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the

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263-268	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are

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269-280	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)
281-307	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions

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	based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)
308-311	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered

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	has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)
312-313	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)

Exhibit 1006 (Paragraph(s))	Objections(s)
314-321	B, K, O, R [B] (The referenced paragraphs lack reliability because the statements fail to set forth a sufficient basis and supporting grounds and analysis for the opinions offered.); [K] (The referenced paragraphs contain statements and opinions based thereon that are outside the personal knowledge of the declarant. The referenced paragraphs also offer statements for which the declarant has not set forth facts demonstrating that the declarant had a factual foundation for the statements offered.); [O] (The referenced paragraphs offer improper opinion testimony on legal/patent law principles, concepts, and rules, which are not a proper subject for opinion testimony from a scientific declarant. This also makes those statements inadmissible under 37 C.F.R. § 42.65(a). The referenced paragraphs also offer opinion testimony not sufficiently explained or documented so that the basis for the opinion offered has not been adequately disclosed, making the statements and conclusions unreliable and improper.); [R] (The referenced paragraphs contain statements that are mischaracterizations/paraphrases of the support cited and insufficiently set forth the basis for the opinions offered, undermining the relevance and reliability of the testimony, making the testimony inadmissible, and rendering the probative value of the testimony outweighed by the prejudicial and confusing nature of the testimony.)

Respectfully submitted,

Date: October 5, 2026

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PGR2026-00037 (Patent 12,347,711)
Patent Owner's Objections to Evidence

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), this is to certify that on this 5th day of October, 2026, I caused to be served a true and correct copy of the foregoing **PATENT OWNER'S OBJECTIONS TO EVIDENCE** by e-mail on the following counsel of record (as identified in the Petition):

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