

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AROMA360, LLC
Petitioner,

v.

AIR ESSSENTIALS, INC.
Patent Owner.

Case IPR 2025-00705
Patent 9,527,094

PETITIONER'S OBJECTION TO EVIDENCE

Aroma360, LLC (“Petitioner”) objects to Exhibit 2002 under FRE 702 as the declaration testimony by Dr. Micklow (a) does not help the Board to understand the evidence or to determine a fact in issue in this proceeding, (b) is not based on sufficient facts or data, (c) is not the product of reliable principles or methods, and (d) to the extent is the product of principles of or methods, does not reliably apply those principles and methods to the facts of the case, including but not limited to his testimony provided in paragraph 19 of the declaration.

In particular, during his March 25, 2026 deposition, Dr. Micklow testified that he did not recall seeing or applying the parties’ agreed-to claim constructions in preparing his declaration and instead applied his own understanding of the claim terms. As Petitioner only became aware of this fact on March 25, 2026, this objection is timely under § 42.64(b)(1).

Date: April 1, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE UNDER 37 CFR § 42.6(e)(4)

The undersigned hereby certifies that a copy of the accompanying Petitioner's Objection to Evidence has been served on April 1, 2026, by via electronic mail directed to the following counsel of record for the Patent Owner:

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Dated: April 1, 2026

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