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On behalf of **Imperative Care, Inc.**

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IMPERATIVE CARE, INC.,
Petitioner,

v.

INARI MEDICAL, INC.,
Patent Owner.

Case IPR2025-00728
Patent No. 11,844,921

**PETITIONER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE
SERVED WITH PATENT OWNER'S RESPONSE**

Pursuant to 37 C.F.R. § 42.64(b), Petitioner Imperative Care, Inc. submits the following objections to the admissibility of evidence served with Patent Owner's Response (Paper 18). Petitioner reserves its rights to: (1) timely file a motion to exclude Patent Owner's evidence, including evidence in the form of testimony or exhibits, or portions thereof; (2) challenge the credibility and/or weight that should be afforded Patent Owner's evidence, whether or not Petitioner files a motion to exclude the evidence; and (3) cross-examine any Patent Owner declarant within the scope of his or her direct testimony that relates to exhibits or other evidence, without regard to whether Petitioner has objected to the testimony or related exhibits or whether the testimony or related exhibits are ultimately found to be inadmissible.

Evidence	Objections
Exhibit 2024 - Declaration of Paul J. Zalesky	<p>Petitioner's objections to the Declaration of Paul J. Zalesky, Ex. 2024, are set forth below. To the extent Dr. Zalesky's declaration incorporates objectionable material in the cited paragraphs below in any additional paragraphs or sections, Petitioner's objections apply with equal force to those additional paragraphs or sections.</p> <p>Improper Testimony by Expert Witness (FRE 702-705):</p> <p>Patent Owner has not shown that the declarant is qualified to testify on the matters and opinions set out in the declaration. The testimony in ¶¶ 76-77, 79, 81, 83, 86, 97, 149, 161-162 is not based on sufficient facts and data, does not disclose the underlying facts and data, and does not reliably apply facts and data using accepted scientific principles.</p>
Ex. 2028 - Deposition	Petitioner incorporates the real-time objections made by Petitioner's counsel in Ex. 2028.

Evidence	Objections
Transcript of Troy Thornton (September 30, 2024)	
Ex. 2030 - Deposition Transcript of Troy Thornton (March 19, 2025)	Petitioner incorporates the real-time objections made by Petitioner's counsel in Ex. 2030.
Ex. 2031 - Deposition Transcript of Troy Thornton (June 25, 2025)	Petitioner incorporates the real-time objections made by Petitioner's counsel in Ex. 2031.
Ex. 2033 - Supplemental Declaration of Paul J. Zalesky	<p>Petitioner's objections to the Supplemental Declaration of Paul J. Zalesky, Ex. 2033, are set forth below. To the extent Dr. Zalesky's declaration incorporates objectionable material in the cited paragraphs below in any additional paragraphs or sections, Petitioner's objections apply with equal force to those additional paragraphs or sections.</p> <p>Improper Testimony by Expert Witness (FRE 702-705):</p> <p>Patent Owner has not shown that the declarant is qualified to testify on the matters and opinions set out in the declaration. The testimony in ¶¶ 77-78, 80, 82, 84, 87, 97, 155, 167-168 is not based on sufficient facts and data, does not disclose the underlying facts and data, and does not reliably apply facts and data using accepted scientific principles.</p>
Ex. 2034 - Deposition Transcript of Troy Thornton (November 20, 2025)	Petitioner incorporates the real-time objections made by Petitioner's counsel in Ex. 2034.

Evidence	Objections
Ex. 2035 - Deposition Transcript of Troy Thornton (January 7, 2026)	Petitioner incorporates the real-time objections made by Petitioner's counsel in Ex. 2035.

Respectfully submitted,

KNOBBE MARTENS OLSON & BEAR, LLP

Dated: January 23, 2026

By: /Joshua J. Stowell/

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Imperative Care, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 37 C.F.R. § 42.6(e), a true and correct copy of **PETITIONER'S OBJECTIONS TO ADMISSIBILITY OF EVIDENCE SERVED WITH PATENT OWNER'S RESPONSE** is being served electronically on January 23, 2026, to the e-mail addresses shown below:

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Dated: January 23, 2026

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