

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IMPERATIVE CARE, INC.,
Petitioner,

v.

INARI MEDICAL, INC.,
Patent Owner.

Case **IPR2025-01025**
Patent No. **11,974,910**

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE
UNDER 37 C.F.R. § 42.64(b)(1)**

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner submits the following objections to exhibits filed by Petitioner, Imperative Care, Inc., with its Petition for *Inter Partes* Review of U.S. Patent No. 11,974,910 B2. Patent Owner's objections apply equally to Petitioner's reliance on these exhibits in its Petition or any subsequently-filed documents regarding same. These objections are timely, having been served within ten (10) business days of the Board's decision to institute a trial in this proceeding.

Exhibit 1003

Patent Owner objects to Exhibit 1003 (Expert Declaration of Troy Thornton) under FRE 702 because the testimony is not based upon sufficient facts or data and is not the result of application of reliable principles and methods. Patent Owner further objects under FRE 703 that the facts or data are not of a type reasonably relied upon by experts. Patent Owner further objects to Exhibit 1003 as creating unfair prejudice, confusing the issues, or as a waste of time pursuant to FRE 403 and as not being relevant and therefore being inadmissible under FRE 401 and 402.

Patent Owner further objects to Exhibit 1003 to the extent that any paragraph relies upon an exhibit that is objected to herein for the reasons set forth in those objections. Any paragraph in Exhibit 1003 that relies upon any exhibit not relied upon by the PTAB to institute this proceeding is further objected to as not being

relevant and therefore being inadmissible under FRE 401 and 402. Patent Owner likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit No. 1003.

Exhibit 1022

Patent Owner objects to Exhibit 1022 (Expert Declaration of Dr. Aquilla S. Turk, III, DO) under FRE 702 because the testimony is biased in view of the individuals affiliation with Petitioner and not based upon sufficient facts or data and is not the result of application of reliable principles and methods. Patent Owner further objects under FRE 703 that the facts or data are not of a type reasonably relied upon by experts. For the same reasons, Patent Owner further objects to Exhibit 1022 as creating unfair prejudice, confusing the issues, or as a waste of time pursuant to FRE 403 and as not being relevant and therefore being inadmissible under FRE 401 and 402.

Patent Owner further objects to Exhibit 1022 to the extent that any paragraph relies upon an exhibit that is objected to herein for the reasons set forth in those objections. Any paragraph in Exhibit 1022 that relies upon any exhibit not relied upon by the PTAB to institute this proceeding is further objected to as not being relevant and therefore being inadmissible under FRE 401 and 402. Patent Owner

likewise objects to any testimony or argument purporting to rely on Petitioner's Exhibit No. 1022.

Furthermore, Patent Owner objects to paragraphs in the Petition that rely on exhibits objected to in this Patent Owner's Objections to Petitioner's Evidence.

Respectfully submitted,

Date: December 22, 2025 By: / Joseph P. Hamilton /
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Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of **PATENT OWNER'S OBJECTIONS TO PETITIONER'S EVIDENCE UNDER 37 C.F.R. § 42.64(b)(1)** was served electronically on December 22, 2025, in its entirety on the following counsel of record for Petitioner:

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