

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRAUMANN USA, LLC,
Petitioner,

v.

SMART DENTURE CONVERSIONS, LLC,
Patent Owner.

Case No. PGR2025-00054
U.S. Patent No. 12,156,781

PETITIONER'S OBJECTIONS TO EVIDENCE
PURSUANT TO 37 C.F.R. § 42.64(b)(1)

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Straumann USA, LLC (“Petitioner”) submits the following objections to new evidence submitted by Patent Owner Smart Denture Conversions, LLC (“Patent Owner”), and any reference to or reliance on the foregoing. Petitioner’s objections are timely under 37 C.F.R. § 42.64(b)(1) because the objections have been filed within 5 business days of service of Patent Owner’s Response, served on April 1, 2026. Paper 29. As required by 37 C.F.R § 42.62, Petitioner’s objections below apply the Federal Rules of Evidence.

Objections to Exhibit 2021

Petitioner objects to Exhibit 2021 (Second Declaration of Karl Leinsing) because Patent Owner has not introduced admissible evidence to establish that Mr. Leinsing is a qualified expert as required by Fed. R. Evid. 702.

In particular, Patent Owner has failed to introduce any evidence that establishes that Mr. Leinsing has the knowledge, skill, experience or training of a person of ordinary skill in the art (“POSA”). In the institution decision, the Board tentatively adopted Petitioner’s definition of a POSA, which requires “at least five years of experience working with (researching, developing and/or designing) dental implants and prostheses, including familiarity and experience with fasteners (threaded and otherwise) used to connect prostheses, implants and related components.” Paper 14 at 17-19 (citing Petition (Paper 1) at 31, Ex. 1002, ¶¶126–

129). Patent Owner has not introduced evidence that demonstrates that Mr. Leinsing has the required experience to be a POSA qualified to provide the expert testimony set forth in Exhibit 2021. In particular, there is no evidence that Mr. Leinsing has any experience working with dental implants and prostheses, much less the required years of experience. Instead, the “Background and Qualifications” section of Mr. Leinsing’s declaration states that he is a medical device engineer with experience working with medical devices, including “implants and devices in the medical field,” such as bone anchors, bone screws, bone plates, surgical anchors, fixation devices and surgical fasteners, but his declaration does not state that he has experience with dental implants and prostheses. Ex. 2021, ¶¶4–10.

Dated: April 8, 2026

Respectfully submitted,

/s/ Sheila Mortazavi

Sheila Mortazavi

Reg. No. 43,343

Counsel for Petitioner Straumann USA, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on April 8, 2026, Petitioner's Objections to Evidence Pursuant to 37 C.F.R. § 42.64(b)(1) was served on counsel for Patent Owner as provided in 37 C.F.R. § 42.6(e) via electronic mail, to the following email addresses:

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