

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TENNANT COMPANY,

Petitioner,

v.

OXYGENATOR WATER TECHNOLOGIES, INC.,

Patent Owner.

Case IPR2021-00625

Patent RE45415

**PATENT OWNER OXYGENATOR WATER TECHNOLOGIES, INC.'S
OBJECTIONS TO TENNANT COMPANY'S FEBRUARY 25, 2022
UPDATED EXHIBIT LIST**

EXHIBITS AND OBJECTIONS

Exhibit #	Objections
1102	FRE106, FRE901, FRE902, FRE1002
1103	<p><u>37 C.F.R. §§ 42.51(c)</u> ¶¶ 39-69, 111-157 discuss things that have not been made available for inspection.</p> <p><u>FRE 702, 703, 37 C.F.R. §§ 42.65(a) and (b)</u> ¶¶ 16, 17, 35, 41, 45-69, 86, 91, 99, 106, 112-134, 136-157, 181, 183, 186, 191, 192, 197, 198, 205, 206 are not based on sufficient facts or data, do not disclose underlying facts or data, do not sufficiently explain the test or data in accordance with 42.65(b), and/or are not the product of reliable scientific principles and methods.</p> <p><u>FRE 402, 403</u> ¶¶ 7, 86, 181, 183, 186, 191, 192, 197, 198, 205, 206 are not relevant; to the extent they are relevant, their probative value is outweighed by the danger of causing unfair prejudice and confusing the issues because they improperly characterize a document or general knowledge.</p>
1104	FRE 402, 403, 602, 701, 702, 703, 802
1114	FRE 106, 402, 403, 901, 1002
1117	FRE 106, 402, 403, 901, 1002
1120	FRE 106, 402, 403, 901, 1002
1121	FRE 106, 402, 403, 901, 1002
1122	FRE 106, 402, 403, 901, 1002
1123	FRE 106, 402, 403, 901, 1002
1124	FRE 106, 402, 403, 602, 604, 802, 901, 1002

1125	FRE 106, 402, 403, 901, 1002
1127	FRE 106, 402, 403, 901, 1002
1128	FRE 106, 402, 403, 901, 1002
1129	FRE 106, 402, 403, 901, 1002
1130	FRE 106, 402, 403, 901, 1002
1131	FRE 106, 402, 403, 901, 1002
1132	FRE 106, 402, 403, 901, 1002
1133	FRE 106, 402, 403, 901, 1002
1134	FRE 106, 402, 403, 901, 1002
1135	FRE 106, 402, 403, 901, 1002
1136	FRE 106, 402, 403, 901, 1002
1137	FRE 106, 402, 403, 901, 1002
1138	FRE 106, 402, 403, 901, 1002
1139	FRE 402, 403
1140	FRE 402
1142	FRE 402, 403
1143	FRE 402, 403
1146	FRE 402, 403
1147	FRE 106, 403,
1148	FRE 106, 402, 403

Dated: March 4, 2022

Respectfully submitted,

/s/ J. Derek Vandenburg

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CERTIFICATION OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e) and the agreement of the parties, the undersigned certifies that on March 4, 2022, a true and correct copy of the foregoing was served via electronic mail upon the following:

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