

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VIKING DRILL & TOOL, INC.

Petitioner

v.

HONGJIA WANG

Patent Owner

IPR2023-00473

IPR2023-00474¹

U.S. Patent No. 11,007,583

**CORRECTED DECLARATION² OF HONGJIA WANG IN SUPPORT OF
PATENT OWNER'S RESPONSE TO VIKING DRILL &
TOOL'S PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 11,007,583**

¹ A word-for-word identical declaration is being submitted in support of IPR2023-00473 and IPR2023-00474.

² This Declaration has been revised to correct formatting only. The content and signature date have been preserved.

DECLARATION OF HONGJIA WANG

I, Hongjia Wang, declare as follows:

1. I am the inventor of U.S. Patent No. 11,007,583 (“583 Patent”). I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those facts, I am informed and believe that they are true. If called as a witness, I could and would competently testify to the matters stated herein.

2. I also am the President and part owner of Tsteigen, Inc, a s corporation located in Maryland, (“Tsteigen”), as well as its manufacturing facility, Tec-Spiral Enterprises Co., Ltd. (“Tec-Spiral”), a Shanghai company located in Shanghai. I have been the President and part owner of both Tsteigen and Tec-Spiral at all times relevant to this declaration and issues in this *inter partes* proceeding.

3. I am the inventor of the invention disclosed and claimed in the ‘583 Patent and have granted licenses to Tsteigen and Tec-Spiral, to practice the rights in the ‘583 Patent.

4. Tec-Spiral manufactures the drill bits that embody the claims of the ‘583 Patent in China, and Tsteigen then supplies those drill bits to the United States marketplace.

5. Tsteigen, in turn, supplies the Easy-Boost drill bits to the United States marketplace through distributors such as Astro Pneumatic Tool Company (“Astro”)

and PartsMaster, Inc. Astro further supplies the Easy-Boost drill bits to another distributor/retailer, Matco Tools Corp. (“Matco”)

6. Within Tsteigen and Tec-Spiral, we normally refer to the product lines of the drill bits that I developed and that embody the claims of the ‘583 Patent as “the Easy-Boost drill bits” or “Boost Tip drill bits.” I often refer to them as Easy-Boost or Boost Tip when referring to them in communications with Astro as well.

7. Astro and Matco, however, each sell the Easy-Boost drill bits under private labels. I am aware of this, because Tec-Spiral and Tsteigen manufacture and supply the private label Easy-Boost drill bits to Astro and Matco, and when doing so, it also produces the product packaging and the metal indexes that the drill bits are contained in.

8. Astro’s private label Easy-Boost drill bits are known as “the Turbo Step” drill bits.

9. Matco’s private label Easy-Boost drill bits are known as “the Hyper-Step” drill bits.

10. Tec-Spiral manufactures several different versions of the Easy-Boost drill bits, including:

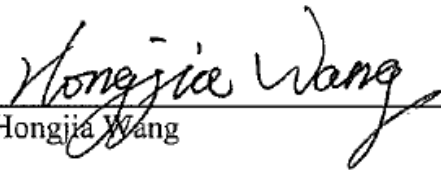
(1) high-speed steel, mechanics length, in the standard 29 drill bit sizes (1/16” to ½” by 1/64ths”);

- (2) high-speed steel, mechanics length, in the standard 29 drill bit sizes, with a reduced shank;
- (3) high-speed steel, large, silver & deming drill bits in the four sizes ($17/32$ ", $9/16$ ", $19/32$ ", $5/8$ ");
- (4) high-speed steel, extra large, silver & deming drill bits in the four sizes ($11/16$ ", $3/4$ ", $7/8$ ", 1 ");
- (5) cobalt, mechanics length, in the standard 29 drill bit sizes;
- (6) cobalt, mechanics length, in the standard 29 drill bit sizes, reduced shank;
- (7) cobalt, stubby length ($1/2$ to $2/3$ the length of the mechanics length), with a reduced shank, in the standard 29 drill bit sizes.

11. Tec-Spiral also manufactures metric versions of the aforementioned drill bits as well, mostly for overseas markets. The metric drill bits are identical to the imperial drill bits in all tip geometry and design and all elements recited in the claims of my '583 patent, only utilizing metric measurements rather than imperial measurements.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this day, October 30, 2023, at Taichung, Taiwan R.O.C..
(city or region) (country)



Hongjia Wang