

UNITED STATES PATENT AND TRADEMARK
OFFICE

BEFORE THE PATENT TRIAL AND APPEAL
BOARD

QUASAR SCIENCE LLC

Petition

er, v.

COLT INTERNATIONAL CLOTHING, INC. d/b/a COLT
LED

Patent Owner.

Case: IPR2023-00611
U.S. Patent No. 10,197,224

**DECLARATION OF DAVID L. HOFFMAN IN SUPPORT OF
PATENT OWNER'S MISCELLANEOUS MOTION FOR
ADDITIONAL DISCOVERY UNDER 37 C.F.R. § 42.51(b)(2)**

I, David L. Hoffman, Esq., declare as follows:

1. I am lead counsel for Patent Owner, Colt International Clothing, Inc. (“COLT”) in the above-captioned IPR proceeding brought by Petitioner Quasar Science LLC (a Delaware LLC) (“Petitioner QUASAR”).
2. Submitted herewith as Exhibit 2010 is a true and correct copy of a Complaint (docket no. 1) from Colt International Clothing, Inc. dba Colt LED v. Quasar Science LLC (“Petitioner Quasar”), no. 1:22-cv-00213 in the U.S. District Court, District of Delaware on February 17, 2022 (the “Litigation”), asserting patent infringement by Petitioner Quasar of various of Colt’s patents including U.S. Patent No. 10,197,224, the subject patent of the subject IPR proceeding.
3. Submitted herewith as Exhibit 2011 is a true and correct copy of a First Amended Complaint (“FAC”)(docket no. 33) as filed in the Litigation.
4. Submitted herewith as Exhibit 2012 is a true and correct copy of the docket of the Litigation as of November 15, 2023, as obtained by me from Pacer.
5. Submitted herewith as Exhibit 2013 is a true and correct copy of a Protective Order as filed in the Litigation and entered by the court on January 19, 2023 (as shown between docket nos. 89 and 90 of Exhibit 2012). Under Section 5.a., material designated Confidential or Highly Confidential – Outside Counsels’ Eyes Only may not be used for any purpose other than the Litigation. Exhibit 2013 at PDF9.

6. Submitted herewith as Exhibit 2014 is a true and correct copy of the cover document and claim infringement charts of Plaintiff's Initial Infringement Contentions as served by Colt on February 27, 2023 in the Litigation.

7. Submitted herewith as Exhibit 2015 is a true and correct copy of a declaration of Zhang, Ya Jun of Laysion, a manufacturer in DongGuan, China.

8. Submitted herewith as Exhibit 2016 is a true and correct copy of web pages from <https://www.quasarscience.com/products/rainbow> marketing Petitioner QUASAR's Rainbow model which I downloaded from Petitioner QUASAR's website on November 17, 2023.

9. Submitted herewith as Exhibit 2017 is a true and correct copy of marketing for Petitioner QUASAR's Rainbow 2 model which I downloaded on November 17, 2023 from Petitioner QUASAR's website and which marketing material was located at https://cdn.shopify.com/s/files/1/0903/0580/files/QS_RR-R2_One-Sheet.pdf.

10. Submitted herewith as Exhibit 2018 is a true and correct copy of web pages from <https://rstvisions.com/products/quasar-q-led-2-r-rainbow-linear-rgbx> that I printed on November 17, 2023.

11. Attached hereto as Exhibit 2019 is a true and correct copy of a press release entitled "The Vitec Group plc Acquisitions and Trading Update" dated April 12, 2019 from Videndum plc's website at www.Videndum.com referring to

The Vitec Group plc (now named Videndum plc) acquisitions, including acquisition of Quasar Science LLC “for up to \$6.1 million ... in cash.” The press release was at https://files.q4europe.com/news-pdf/3294/VitecGroup_15026132.pdf. I downloaded it in July 2023.

12. Submitted as Exhibit 2020 is a true and correct copy of an annual results report by Vitec Group PLC entitled “The Vitec Group plc 2021 Full Year Results” dated March 1, 2022 accessed from Videndum plc’s website at www.Videndum.com. On November 16, 2023, I downloaded this annual results report from https://files.q4europe.com/news-pdf/3294/VitecGroup_15348316.pdf.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the patent asserted herein.

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

Executed this 17th day of November 2023, at Valencia, California.

Date: November 17, 2023

/David L. Hoffman/
David L. Hoffman, Reg. No. 32,469