

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TROVE BRANDS, LLC,

Petitioner

v.

CAMELBAK PRODUCTS, LLC,

Patent Owner

IPR2024-01137
Patent 10,676,255 B2

DECLARATION OF RYAN SCHLETZBAUM

Trove Brands, LLC v. Camelbak Products, LLC
IPR2024-01137
Exhibit 2007

I, Ryan Schletzbaum, declare as follows:

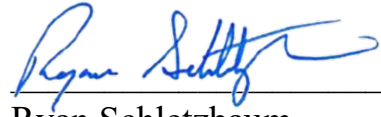
1. I am over 21 years of age and competent to make this declaration. I make this declaration based on my own personal knowledge.
2. I am a partner of Shook, Hardy & Bacon L.L.P., and I am counsel of record for Patent Owner CamelBak Products, LLC in *Trove Brands, LLC v. CamelBak Products, LLC*, Case No. 5:23-cv-04267-PCP, in the Northern District of California, San Jose Division (the “District Court Case”).
3. Exhibit 2002 is a true and correct copy of a Stipulation and Joint Motion to Amend the Case Schedule filed August 2, 2024, in the District Court Case. The “Revised Deadlines” column on pages 2–3 thereof accurately state the current schedule in the District Court Case.
4. Exhibit 2003 is a true and correct copy of the docket in the District Court Case printed from the Northern District of California’s CM/ECF system on October 2, 2024.
5. Exhibits 2004 through 2006 are true and correct copies of infringement contentions (Exhibit 2004) and invalidity contentions (Exhibits 2005 and 2006) (in each case, without the attached claim charts) served by the respective parties in the District Court Case. Exhibit 2006, served on July 18, 2024, is the most recent set of invalidity contentions served by Petitioner Trove Brands, LLC in the District Court Case.

6. Exhibits 2013 and 2014 are true and correct copies of invalidity claim charts identified as Appendices D1 and D3 to Petitioner's invalidity contentions in the District Court case. Petitioner served these claim charts on April 12, 2024.

7. As of October 30, 2024, the parties have conducted extensive discovery, including the following:

- Patent Owner has served two sets of Requests for Production (107 requests), one set of Interrogatories (11 interrogatories), and one set of requests for electronically stored information (ESI).
- Petitioner has served three sets of Requests for Production (134 requests), three sets of Interrogatories (14 interrogatories), and one set of requests for electronically stored information (ESI).
- The parties' production of documents in response to the parties' First and Second Requests for Production was substantially complete by June 2024. Fact discovery closes on December 20, 2024.
- Deposition of fact witnesses have been conducted, including depositions of two party-employee witnesses and one inventor.
- The District Court has held two hearings to resolve discovery disputes relating to responses to interrogatories and document requests.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on October 30, 2024, in Kansas City, Missouri.



Ryan Schletzbaum