

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AVANOS MEDICAL, INC.,
Petitioner,

v.

STRATUS MEDICAL, LLC,
Patent Owner.

Case IPR2024-01209
Patent 10,966,782

Case IPR2024-01210
Patent 10,736,688

Case IPR2024-01211
Patent 10,736,688

Case IPR2024-01212
Patent 10,952,664

DECLARATION OF DENNIS JOHNSON

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I. INTRODUCTION

1. My name is Dennis Johnson. I am currently employed by Avanos Medical, Inc. as an Associate Marketing Director.

2. I began working at Avanos in 2021 as a Senior Global Product Manager. In 2024, I was made the Associate Marketing Director at Avanos, the position I hold today. In my current position at Avanos, I am a marketing leader responsible for marketing Avanos's COOLIEF* brand of cooled radiofrequency ablation systems. In that role, I regularly review, analyze, and rely on sales data for Avanos's COOLIEF* products provided to me by Avanos's finance department.

II. SALES DATA FOR THE COOLIEF* COOLED RF PAIN MANAGEMENT RADIOFREQUENCY PROBE

3. Avanos sales information, including that reflected in the table below, is maintained in our corporate financial systems. Data about Avanos's sales transactions are created and maintained in Avanos's financial systems in the regular course of Avanos's business.

4. I regularly rely on the finance department to provide me with reports summarizing Avanos sales data (including custom reports like the one discussed below) obtained from our financial systems to support me in my role as an Associate Marketing Director for Avanos.

5. I asked Avanos's finance department to prepare a report showing total sales of the COOLIEF* Cooled RF Pain Management Radiofrequency Probe, in

[REDACTED]

both dollars and units, for the years 2023 and 2024. A table showing the information I received from Avanos’s finance department in response to this request is provided below.

Annual COOLIEF* Sales: 2023 and 2024

Year		Net Sales		Quantity	

6. The table above shows the quantity and net sales of COOLIEF* “probe” products. The net sales figures indicated in the table are after discounts.

7. The products included in the report and table above include COOLIEF* “kits” that are sold in sets of 1, 2, or 3. Each COOLIEF* kit includes one introducer and one cooled-RF probe, two introducers and two cooled RF-probes, or three introducers and three cooled-RF probes. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The table does not reflect sales of associated generators, pumps, and other components of the COOLIEF* system.

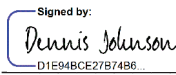
8. With respect to the COOLIEF* system, I note that the term “probe” refers to the cooled-RF probe that is inserted through the introducer and delivers radiofrequency energy. Like the Stratus “Nimbus” electrode and probe, the

COOLIEF* introducer and probe are used together to perform RF neurotomy procedures.

III. CONCLUSION

9. I declare that all statements made herein on 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 § 1001 of Title 18 of the United States Code.

Executed on: September 4, 2025

Signature:  Signed by: Dennis Johnson
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By: Dennis Johnson