

May 22, 2017

Brenna Legaard
T: 503-796-2471
blegaard@schwabe.com

Via E-Mail Only:

(john@harrisbricken.com)
(jts@fsclaw.com)
(pinkus@fsclaw.com)
(orman@fsclaw.com)

John Mansfield
HARRIS BRICKEN
121 SW Morrison, Suite 400
Portland, OR 97204

Jonathan T. Suder
Brett M. Pinkus
Glenn S. Orman
FRIEDMAN, SUDER & COOKE
604 E. Fourth Street, Suite 200
Fort Worth, TX 76102

RE: Adasa Inc. v. Avery Dennison - USDC Case No. 6:17-cv-00287-AA
Our File No: 125029-221968

Dear Gentlemen;

Gentlemen, thank you for filing the First Amended Complaint ("FAC") to remedy the deficiencies in the original complaint. As we have reviewed the FAC, however, we have discovered that it still fails to make out a plausible claim for relief.

You have accused Avery Dennison of infringing claim 1 and several of its dependents. Claim 1 requires an RFID transponder having a unique serial number space with "an allocated block stored therein defined by a limited number of most significant bits of the unique serial number space as designated by an external numbering authority." The FAC makes clear that an "allocated block" is a block of serial numbers. See FAC, ¶16 ("This sector of "most significant bits" is allocated as a block of serial numbers by designation of an external numbering authority.")). The specification of the '805 Patent and its intrinsic record use the term "allocated block" exclusively to mean a block of serial numbers. For example: "Each allocated block of serial numbers represents authority for encoding objects of an object class that can be either used by an encoder for encoding transponders, or allocated to a lower level in the authority hierarchy." '805 Patent, 8:17-20. The term "block" is used in the same way in the prosecution history, where Mr. McAllister himself explained to the examiner that the allocated blocks of his invention contain a range of sequential serial numbers. For example, in the response filed on

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May 1, 2015, Mr. McAllister told the examiner that “the allocated blocks each include a range of sequentially numbered serial numbers,” and “the allocated blocks each include a range of randomly assigned serial numbers.” page 4, Response filed on May 1, 2015 (emphasis added). All the sources in the FAC, the specification, and the prosecution history make it clear that an allocated block is a block of multiple serial numbers, and thus the only plausible construction of “allocated block” in claim 1 is a block of serial numbers. However, the FAC does not identify any RFID transponder encoded by Avery Dennison on which is stored an allocated block of multiple serial numbers. Nor could it so plead, as Avery Dennison encodes each RFID transponder (tag) with only one serial number. Thus, the FAC does not plead a plausible claim for relief. If you cannot or will not address this insufficiency, we will move to dismiss your claims under Rule 12(b)(6).

Additionally, the FAC contains numerous factual contentions which are demonstrably false. Specifically, the following factual allegations in the FAC do not comply with Fed. R. Civ. P. 11. Accordingly, we additionally ask that you remove these factual allegations from your pleading.

1. Paragraph 9: The FAC asserts that after ADASA was founded, the RFID industry has since “developed standards and guidelines for encoding data onto the RFID tags to provide additional information beyond what can be stored in a barcode, which allows for identifying and tracking individual items in the supply chain.”

The RFID industry had developed standards and guidelines for encoding data into RFID tags that allowed for identifying and tracking individual items in the supply chain well before ADASA was founded in August 2004. For example, EPCglobal was formed in October, 2003, and a draft standard, e.g., EPCTM Tag Data Standards Version 1.1 Rev. 1.23, (“Rev. 1.23”), was drafted in 2003 and published in February 2004. Rev. 1.23 is attached as Exhibit A to this letter. Rev 1.23 describes the SGTIN system, which uniquely identifies objects and individual items in the supply chain. Further, as explained on page 44 of *RFID for Dummies* by Patrick J. Sweeney, II, published in 2005, attached as Exhibit B to this letter, standards and guidelines for encoding data onto RFID tags were developed by a collaborative effort called the Auto-ID Center, which began at MIT in 1999, and eventually resulted in the formation of EPC Global, which licenses the intellectual property created by the collaborative effort, allocates EPC numbers to end users, and determines RFID numbering standards. At the time Mr. McAllister founded ADASA, methods for using RFID tags to track individual items in the supply chain had been established by EPC Global and its predecessors.

2. Paragraph 12: “Therefore, in order to provide a unique identifier and avoid duplication of numbers, the brand owner is responsible for assigning a unique serial number for each item within an object class.”

This statement is also incorrect. While some brand owners may retain the responsibility for assigning unique serial numbers, brand owners frequently delegate all responsibility for

generating and assigning serial numbers to vendors such as Avery Dennison. The prosecution history of the '805 Patent concedes this, making specific reference to the delegation of authority that occurs within a hierarchy. See page 12, response filed on February 20, 2015.

3. Paragraph 13: "Prior to Mr. McAllister's invention, other methods of managing and assigning EPCs did not ensure that the EPC provided to an item would be globally unique."

This statement is explicitly contradicted by earlier allegations of the FAC such as paragraph 10, which states that an EPC is "an identifier for an item in the supply chain to uniquely identify that particular item." EPCs predated Mr. McAllister's invention, and an EPC cannot "uniquely identify that particular item" in the supply chain unless it is "globally unique." As explicitly stated in the Background section of the '805 patent, "[g]enerating a unique serial number is imperative, and is required for EPCglobal RFID tagging implementations. Serialization requires a central issuing authority for numbers for manufacturers, products, and items to guarantee uniqueness and to avoid duplication of numbers." '805 Patent at 2: 18-23.

4. Paragraph 13: "This is exemplified by the RFID industry's use of the "EPC Pure Identity URI" methodology. In this format, no attention is given to making a unique number on the "binary" level (*i.e.*, at the zeroes and ones that make up the most basic bits of the written code), rather choosing a simpler and less effective "decimal" or "hexadecimal" level representation of the EPC. ..."

This statement is untrue for multiple reasons.

First, the use of "EPC Pure Identity URI" format unquestionably generates globally unique EPC numbers. In fact, the SGTIN format described in paragraphs 10, 11, and 12 of the FAC is one type of "EPC Pure Identity URI." See Rev. 1.23, pages 9-11. The FAC itself states that EPC numbers in the SGTIN format are globally unique numbers. See FAC ¶11, stating that the SGTIN format contains "object class" information and a "serial number," and FAC ¶12, stating that the "combination of an object class and unique serial number provides a unique object number that is contained within the EPC."

Second, any given number can be written in hexadecimal form or binary form. Humans are better at reading that number if it is in hexadecimal form, and machines can read that number if it is in binary form, **but either way, it is the same number. Only the form is different.** You seem to acknowledge this later in the same paragraph, when you provide an example of an EPC in decimal form and then translate the same number in binary form according to the STGIN-96 format. Either an EPC is globally unique or it is not; whether it is expressed in binary form or hexadecimal form is irrelevant to its uniqueness. The statement that EPC Pure Identity URI methodology is not concerned with producing unique numbers in binary form either demonstrates a profound lack of understanding or is deliberately deceptive.

5. Paragraph 14: “In early 2008, McAllister recognized the challenge in the industry that there was not a reliable way to ensure global uniqueness of the EPC for items within one object class when the RFID tags are encoded by different encoders in different locations across the distribution chain.”

This statement is explicitly contradicted by the description of the state of the art at the time of invention found in the Background section of the ‘805 patent, which describes exactly how the industry at that time ensured globally unique EPC numbers when tags are encoded in different locations:

Generating a unique serial number is imperative, and is required for EPCglobal RFID tagging implementations. Serialization requires a central issuing authority of numbers for manufacturers, products, and items to guarantee uniqueness and to avoid duplication of numbers. Blocks of numbers are distributed to remote locations globally. Unless a product (or SKU) is serialized at one location, the numbering space is usually partitioned according to some method, or each remote location receives each number one-by-one. Either way, there is eventually a reconciliation of serial number usage with a granularity of either one or several numbers at a time.

‘805 Patent, 2:18-29.

RFID for Dummies also describes another method of reliably allocating unique numbers across many lines and locations. See Ex. B pp. 239-240.

6. Paragraph 14: “In particular, the EPC Pure Identity is what is known as a canonical form, using a finite sequence of decimal digits, punctuated by periods. The EPC Pure Identity lacks the ability to uniquely distinguish between objects that, for example, are located on retail store shelves versus pallets of the same objects that are located in a store room or on a shipping dock....”

This statement is untrue for multiple reasons. First, it is explicitly stated in Rev. 1.23, pages 2 and 47, that “URIs for pure identities, sometimes called “canonical forms” ... contain only the unique information that identifies a specific physical object.” This is true regardless of where the objects are located.

Second, as described above, the SGTIN format referred to in paragraphs 10, 11, and 12 of the FAC is one type of “EPC Pure Identity URI.” See Rev. 1.23, pages 9-11. As alleged in paragraph 11 of the FAC, the SGTIN format contains “object class” information and a “serial number.” As stated in paragraph 12 of the FAC, the “combination of an object class and unique serial number provides a unique object number that is contained within the EPC.” Therefore, the SGTIN format, as a type of “EPC Pure Identity URI,” is designed to uniquely distinguish

between objects, again, regardless of where they are located. Indeed, that is the entire point of RFID tagging, and has been since its inception.

7. Paragraph 14: “Additionally, because the EPC Pure Identity scheme does not match the EPC RFID tag encodings, it could not be guaranteed that the serial number assigned to the EPC for each item within an object class was unique.”

This statement is also untrue. First, the EPC Pure Identity scheme does match the EPC RFID tag encodings. The EPC Pure Identity Scheme dictates EPC RFID tag encodings. As discussed above, the SGTIN format is one type of EPC Pure Identity scheme, and the FAC explicitly admits that the SGTIN format matches the EPC RFID tag encodings in the SGTIN-96 format. See the example in Paragraph 13.

Second, the EPC Pure Identity scheme can and is intended to guarantee that the serial number assigned to the EPC for each item within an object class is unique. For example, the SGTIN format is one type of EPC Pure Identity scheme, see Rev. 1.23, pages 9-11. In addition, EPCs in the SGTIN format are globally unique, as alleged in paragraph 12 of the FAC, “Therefore, in order to provide a unique identifier and avoid duplication of numbers, the brand owner is responsible for assigning a unique serial number for each item within an object class. The combination of an object class and unique serial number provides a unique object number that is contained within the EPC.”

8. Paragraph 14: “To address this challenge, McAllister focused not on the Pure Identity representation of the EPC, but rather more specifically on the “serial number” portion of the binary level encoding of the EPC to accomplish this new goal.”

This statement is either false or nonsensical. “Pure Identity representation[s] of the EPC” include serial number portions, and they can be presented in binary form or hexadecimal form, as can any number. See Ex. A at pages 8-11.

9. Paragraph 15: “McAllister configured the memory structure to further delineate a sector using the leading bits of the serial number section of the EPC binary encoding, which are referred to in the ‘805 patent as the ‘most significant bits.’ In other words, McAllister subdivided the serial number section into a ‘most significant bits’ section and a ‘lesser significant bits’ portion.”

McAllister did not “configure the memory structure” of any chip. All EPC SGTIN-96 chips have 96 bits of memory, and each bit can be encoded with a 0 or a 1. EPCglobal sets and administers standardized ways of using those 96 bits. In 2004, EPC published a standard that divided the 96 bits of memory up this way, reprinted from Rev. 1.23, page 22:

In addition to a Header, the SGTIN-96 is composed of five fields: the Filter Value, Partition, Company Prefix, Item Reference, and Serial Number, as shown in Table 6 below.

	Header	Filter Value	Partition	Company Prefix	Item Reference	Serial Number
SGTIN-96	8	3	3	20-40	24-4	38
	0011 0000 (Binary value)	8 (Decimal capacity)	8 (Decimal capacity)	999,999 – 999,999,9 99,999 (Decimal capacity*)	9,999,999 – 9 (Decimal capacity*)	274,877,906 ,943 (Decimal capacity)

*Capacity of Company Prefix and Item Reference fields vary according to the contents of the Partition field.

McAllister’s ‘805 Patent proposes a method of “providing pre-authorized blocks of object class serial numbers” by subdivide[ing] the entire object class serial number space into sectors that are defined by a limited number of MSB’s (Most Significant Bits) of the serial number field.” ‘805 Patent, 7:63-67. Mr. McAllister did not “configure” memory. Nothing about his invention teaches changing the structure of the chips themselves.

10. Paragraph 22: alleges that Avery Dennison infringes the ‘805 Patent because it “encodes the RFID tags and labels with an EPC having a unique serial number for a specific object class, in which a block of the most significant bits of the serial number space within the EPC binary encoding is allocated to the encoder by an external numbering authority....”

The ‘805 Patent does not teach the allocation of sectors of “most significant bits” to encoders. The ‘805 Patent teaches the allocation of **blocks of serial numbers** to encoders. ‘805 Patent, 7:56-66. As Mr. McAllister argued to the Patent and Trademark Office in his efforts to obtain the ‘805 patent, a sector of “most significant bits” is used by “upper levels of the hierarchy (i.e., a GS1 Member Organization or its delegates) **to allocate a serial number block to an encoder internal memory**. “The encoder uses ‘the bits of lesser significance’ to select an unused unique serial number to encode into an RFID transponder.” See Reply to Office Action dated 22 Aug 2014, which is filed on February 20, 2015, page 13, lines 19-25.

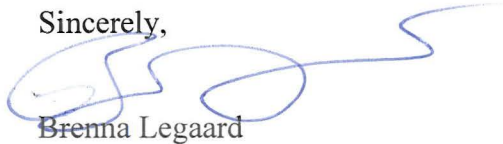
11. The same allegation is repeated in Paragraph 23, which alleges “3 or more of the most significant bits of the serial number space being indicative of a fixed block [of 18 most significant bits] allocated to the encoder for a specific object class.” But again, the ‘805 Patent repeatedly uses the term “block” to refer to a block of serial numbers, not a sector of most significant bits. See ‘805 Patent, 7:57, 61, 64, 8:17. It teaches allocation of those blocks of serial numbers to encoders. See, e.g., ‘805 Patent, 7:56-58 (“A preferred method for quasi-

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autonomous transponder encoding authority is realized when large pre-authorized blocks of serial numbers are made available to encoder 175 or 30 to utilize on object classes as objects of a class are presented for tagging.”).

I believe we can all agree that further extensions of time would not be appropriate, so please provide times during the week of May 22 in which you are available so that we can discuss these issues and, if necessary, confer as required by the local rules.

Sincerely,



Brenna Legaard

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To EPC or Not to Be: Unraveling the Words, Words, Words of the Electronic Product Code

What the UPC is to bar codes, the EPC (electronic product code) is to RFID. When an RFID reader scans a tag on a case of toothpaste, the tag sends an EPC number to the inventory management system, letting it know exactly which case of toothpaste it just saw, where it was, and at what time it saw it. If you are one of the 60,000 companies under a mandate to implement RFID, you need to do so by using the EPC protocol. Thus, understanding it helps you get your arms around not just the technology of RFID, but also the standards of EPC.

Birth of a revolution: The MIT Auto-ID Laboratory

Like many technology revolutions, the Auto-ID development has come about primarily because of the DoD. Since the early 1990s, the DoD has been using active RFID to tag shipping containers moving throughout the DoD supply chain. The private sector soon realized that the DoD's massive supply chain was a great proxy for any commercial supply chain: they could use RFID to track cases and items, rather than just shipping containers, and make a huge impact on their operations.

However, the retailers needed to sort out major shortcomings in price, size, and interoperability. The people most interested in seeing RFID blossom — namely, large retailers and consumer packaged good (CPG) manufacturers, along with the DoD — funded MIT's Auto-ID Center in 1999. The Auto-ID Center's goal was to make RFID a viable technology in the supply chain.

The MIT Auto-ID Center team was energized by the leadership of Sanjay Sarma and David Brock and was augmented by Kevin Ashton (an executive on loan from Procter & Gamble). The team needed some big foreheads to figure out all the tough issues, so Sarma enticed one of his former grad students, Daniel Engels, to finish his Ph.D. at MIT and help solve issues that the

Auto-ID Center faced. The MIT team also needed some world-class physics and RF expertise; for that the team enlisted Dr. Peter Cole from the University of Adelaide in Australia. With this team in place, the Auto-ID Center set about creating technology that was smaller, cheaper, and solved the interoperability issues.

The Auto-ID Center eventually morphed into a conglomerate of six universities: MIT, the University of Cambridge, the University of Adelaide, Keio University, Fudan University, and the University of St. Gallen — each with its own focus and unique capabilities but linked by the common vision of an "Internet of things." Their collective goal was to "develop new technologies and applications for revolutionizing global commerce and providing previously unrealizable consumer benefits."

In October of 2003, the Auto-ID Center licensed its intellectual property to the EPC to the UCC — the Uniform Code Council (the bar code folks). The UCC created a new subsidiary, *EPCglobal*, to manage the licensing of the EPC property and to allocate EPC numbers to end users. EPCglobal also made the final determination of what the standards and protocols look like.

The general identifier of the electronic product code (EPC) is a good example: The general identifier EPC comprises three numbers whose combination uniquely identifies an item. Those three numbers are the manufacturer number, the product number, and the serial number. EPCglobal, the manager of the general identifier EPC, assigns a unique manufacturer number (also called an EPC Manager Number) to each of its member organizations. Each member organization is free to assign a product number (also called an Object Class) to each of that member's products. Similarly, each member is free to assign a serial number to each item manufactured by that member. Here's how you might take advantage of this hierarchy to uniquely identify an item:

- ✓ **Assign the same product number to all products with the same properties.** Thus, all 16-ounce blue bottles of Fabulous Fiber are assigned the same product number. All 24-ounce bottles are allocated a different product number. This is the basic approach used today by most product manufacturers.
- ✓ **Assign each item in a product line a unique serial number.** In this way, you can distinguish one 16-ounce blue bottle of Fabulous Fiber from another bottle just like it.

Serial numbers are new to the fast-moving consumer goods market, but they have been in wide use in the electronics, automotive, and aerospace industries, among others, for a very long time.



Allocating unique numbers across many lines and locations

Because all products of the same type receive the same product number, the serial numbers must be maintained in order to enable unique item identification. When a product is manufactured on exactly one production line at exactly one location, assigning unique serial numbers to every item manufactured is straightforward. A central numbering allocation authority may be used. Difficulties arise when multiple lines, potentially at multiple locations, are used to manufacture the same product.

When multiple manufacturing lines are used to manufacture the same product, a centralized numbering authority is more difficult to manage. The centralized authority must be consulted every time an item is produced, requiring that it be accessible over the network whenever production runs are in process. A centralized authority that is always reachable and is able to assign numbers at production speeds can efficiently use the numbering space. Additionally, careful details must also be maintained about which line an item was produced on.

An always-accessible central numbering authority isn't practical for many companies. These companies can use an intelligent hierarchy imposed on the serial number allocation to decentralize and make feasible the allocation of unique serial numbers across all manufacturing lines.



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Here's a simple example of a decentralized, hierarchical approach to allocating serial numbers. A range of serial numbers for each product is allocated to each manufacturing facility. Within a facility, a range of numbers from those allocated to the facility is allocated to each line producing a particular product. In this way, the serial number is effectively subdivided into a facility number, line number, and subserial number, in which the allocation hierarchy is maintained between facility number and line number.



Remember to assign a line number for hand-applied tags that replace damaged or nonfunctioning tags. You need to look at your business processes to determine the best way to incorporate this.

Applying Tags to Objects

Eventually, all tags will be placed on products automatically, either on the packaging prior to receiving it or on-line within your facility. Until then, tags need to be manually placed on items.



When you apply tags to objects (or train staff to do so), you need to keep two important factors in mind:

- ✓ **Be sure you handle tags in a way that doesn't put stress on the tag's connections and parts.** Broken tags don't communicate well (if at all) and thus make your system less effective. See the sidebar, "Armor-plated tags," for details on emerging solutions to these vulnerabilities.
- ✓ **Place the tag in the optimal spot on the object.** During your testing (see Part III), you determine where the tag antenna can best couple (communicate) with the reader antenna. Some of the early adopters have already started printing tag outlines on their case boxes so that workers applying them know exactly where the tag goes and what the correct orientation is.

The following sections explain how you can work around these two factors as you apply the tags.

Applying tags without breaking them

Manually manipulating tags always has the potential hazard of physically damaging them. You can minimize the physical stress placed upon the tags by always following these steps when applying tags by hand: Adasa Inc.

1. Place the label face down on a flat surface with the backing paper face up; the face of the label is therefore down on the table or flat surface.
2. Peel the backing paper away from the label while keeping the label flat on the surface.

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