UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EUNSUNG GLOBAL CORP.,

Petitioners,

v.

HYDRAFACIAL LLC

Patent Owner.

Case No. IPR2025-00452
U.S. Patent No. 12,053,607

DECLARATION OF VIPUL SAVSANI

[REDACTED]

1. I, Vipul Savsani, make this declaration at the request of Patent Owner HydraFacial LLC ("HydraFacial") in the matter of Inter Partes Review No. IPR2025-00452, related to U.S. Patent No. 12,053,607 ("'607 patent"). I understand that this declaration is being submitted in this proceeding as an exhibit.

2. I am HydraFacial's Global Vice President of Financial Planning and Analysis (Global VP of FP&A). I started working at HydraFacial in 2015. I received my Bachelor of Science degree in accounting from Northern Illinois University.

3. In my role as HydraFacial's Global VP of FP&A, I am responsible for many aspects of HydraFacial's finances, including accounting, financial planning and analysis, tax, and investor relations. I report directly to HydraFacial's Chief Financial Officer, Michael Monahan.

4. HydraFacial maintains a financial data warehouse known as Tableau. The data warehouse includes information pulled from HydraFacial's various Enterprise Resource Planning ("ERP") systems (current and prior systems). The database includes revenue information along with invoice level detail, including customer master, regions, and items level detail.

5. In connection with HydraFacial's complaint against several companies in the International Trade Commission, I was asked to generate various financial reports containing sales information relevant to certain HydraFacial hydrodermabrasion products, including HydraFacial's Tower, Allegro, Elite and

Syndeo products, which I understand are multi-container products covered by the ’607 patent at issue in this proceeding. I was also asked to include sales information for HydraFacial’s discontinued Nectre product, which I understand was a single-container hydrodermabrasion product not covered by the ’607 patent.

6. I extracted data from the financial data warehouse to generate the financial reports used in the ITC Investigation. The data from one such report is included in Exhibit 2010. Exhibit 2010 is a spreadsheet summarizing the global sales data (revenue and units sold) for HydraFacial’s Tower, Allegro, Elite, and Syndeo. Exhibit 2010 also includes global sales data (revenue and units sold) for HydraFacial’s Nectre product. The sales data spans the time period from 2005 through Q2 2024, although not all products were available for sale during the entire period reported.

7. For the time period 2005 through Q2 2024, the HydraFacial Tower, Allegro, Elite, and Syndeo, together had a combined global revenue of approximately [redacted]. I have summarized the revenue in the table below:

Product	Period	Global Revenue
Tower	2005-2023	[redacted]
Allegro	2012 - Q2 2024	[redacted]
Elite	2016 - Q2 2024	[redacted]
Syndeo	2022 - Q2 2024	[redacted]
Total	**2005 - Q2 2024**	[redacted]

8. For the period of 2006 to 2013, the HydraFacial Nectre had global revenue of approximately [redacted].[1] By comparison, HydraFacial's Tower and Allegro were the multi-container products offered for sale during the period of 2008-2013, and they had a combined global revenue of approximately [redacted] during that period.

[1] [redacted]

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 Section 1001 of Title 18 of the United States Code.

Dated: 5/13/2025 By: / *Vipul Savsani* /
Vipul Savsani