

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LIFEVAC, LLC,
Petitioner

v.

DCSTAR INC.,
Patent Owner

Case No.
IPR2025-00454
Patent No. US
11,478,575

DECLARATION OF RAM.SHAW PTE. LTD.

This DECLARATION (the "Declaration") is hereby made by RAM.SHAW PTE. LTD., a limited liability company incorporated under the laws of Singapore, with its principal place of business located at 73 Upper Paya Lebar Road, #06-01C Centro Bianco, Singapore 534818 (hereinafter referred to as the "Declarant").

1. The undersigned is the Chief Operating Officer for the Declarant and has the authority to execute this declaration on behalf of Declarant.
2. Declarant is the lawful owner of the federally registered trademark IDEAR in the United States under U.S. Registration No. 6693596, registered on April 5, 2022. (Ex. 2003).
3. Declarant has maintained a long-term partnership with DCSTAR, the owner of U.S. Patent No. 11,478,575 B1 (Ex. 1001).
4. Declarant has authorized the Amazon store operating under the name Cultures Inc. to use the IDEAR trademark and to market and sell IDEAR-branded products in the United States, including the anti-choking device shown in Ex. 2004. (Ex. 2005).
5. I understand that an Amazon Store screenshot (Ex. 2004), which illustrates Culture Inc.'s anti-choking device having ASIN number B093NZN5C7, was cited during prosecution of U.S. Patent No. 11,478,575 B1 (Ex. 1002 at 135, 145). As the authorized trademark owner of IDEAR, I have personal knowledge that the website featured in

Ex. 2004 was publicly disclosed at the Amazon Store at least as early as April 28, 2021.

6. Declarant affirms that the subject matter described in Ex. 2004 was obtained directly or indirectly from Ligui He.

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

RAM.SHAW PTE. LTD.

Signed: 



Name: Flora Chan

Title: COO

Executed on: April 24, 2025