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 DAVID LUO

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This DECLARATION (the "Declaration") is hereby made by David Luo, also known as Dawei Luo (hereinafter referred to as the "Declarant".)

1. Declarant is the President and sole shareholder of Patent Owner, DCSTAR INC, a corporation duly incorporated under the laws of the United States, with its principal place of business located at 228 Park Ave S #30327, New York, NY 10003, United States. DCSTAR INC is the owner of U.S. Patent No. 11,478,575 B1 (Ex. 1001, hereinafter referred to as the "'575 patent"). *See* DCSTAR Certificate of Incumbency (Ex. 2024).
2. Declarant also serves as the Director and sole shareholder of RAM.SHAW PTE. LTD., a private limited company organized and existing under the laws of Singapore, with its principal place of business located at 73 Upper Paya Lebar Road, #06-01C Centro Bianco, Singapore 534818. *See* RAM.SHAW PTE. LTD. Certificate of Incorporation (Ex. 2025); Share Certificate (Ex. 2026); and Business Profile (Ex. 2027)
3. As explained in a Product Co-Development Agreement, Ex. 2029, DCSTAR INC. commissioned Ligui He to carry out the research and development activities that led to the invention claimed in the '575 patent.
4. Ligui He subsequently obtained the '575 patent and assigned that patent to DCSTAR INC. DCSTAR INC. granted RAM.SHAW PTE.

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LTD. a license to use certain intellectual property owned by DCSTAR INC, including, but not limited to, the technology disclosed and claimed in the '575 patent. *See* Cooperation Agreement (Ex. 2028).

5. RAM.SHAW PTE. LTD. operates the Amazon storefront operating under the name Cultures Inc. The IDEAR product shown in the IDEAR reference (Ex. 2004) and in Ex. 2021 incorporates the '575 patented technology and has been commercialized through the Amazon storefront.

6. RAM.SHAW PTE. LTD. 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).

7. RAM.SHAW PTE. LTD. 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 antichoking device shown in the IDEAR reference, Ex. 2004. (Ex. 2005).

8. The IDEAR reference, Ex. 2004, is an image taken from the Amazon store referenced above, and was authorized by RAM.SHAW PTE.LTD. under license from DCSTAR INC.

9. As demonstrated by the above facts and exhibits cited herein, the subject matter illustrated in the IDEAR reference, Ex. 2004, originated from Ligui He, the inventor of the '575 patent.

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

DAVID LUO

Signed: _____

Name: David Luo

Title: President and Sole Shareholder of DCSTAR INC.; Director and Sole Shareholder of RAM.SHAW PTE. LTD.

Executed on: Jan. 9. 2025

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