DECLARATION OF JOHN ROCHE

I, John Roche, hereby declare that:

1. I am currently the Senior Director of Engineering for Hillphoenix, Inc. ("Hillphoenix"), a Dover company that manufactures and sells retail refrigeration products. I have been employed by Hillphoenix since January 2014. Before Hillphoenix, I was employed by Anthony Inc. ("Anthony"), a Dover company that manufactures and sells refrigerator door products. I was employed by Anthony from October 2008 to December 2013. During my time at Anthony, I held the position of Director of New Product Development.

2. I make this declaration based on facts that I personally know, matters that I have reasonably investigated, and/or information that has been provided to me that I believe to be accurate. I have been informed that there is an ongoing patent dispute between Anthony and Hillphoenix and a company called ControlTec, LLC ("ControlTec") that is a supplier of anti-sweat controllers. I have also been informed that this declaration may be submitted in legal proceedings regarding that dispute.

3. Between October 2008 and December 2013, while serving as Anthony's Director of New Product Development, it was my responsibility to know and understand Anthony's current refrigerator door products, as well as Anthony's anticipated future refrigerator door products, both planned and under active development or testing. Accordingly, I was aware during that timeframe that

Anthony's refrigerator door products were often equipped with anti-sweat controllers. By "anti-sweat controllers," I refer to controllers that selectively activate heating elements on or around the door to eliminate or prevent condensation.

4. As Anthony's Director of New Product Development, I would have been in a position to know if Anthony had a business reason to track or monitor ControlTec between 2008 and 2013. However, during that time, I was not aware of ControlTec as a supplier of anti-sweat controllers. I was also not aware of the "AS-20 system," which I have been told is the name of one of ControlTec's anti-sweat products. Nor was I aware of any other product made by ControlTec. I was also not aware of any patents that ControlTec may have filed for or obtained. I was also not aware of any patent monitoring by Anthony regarding anti-sweat controllers. Nor was I aware of any business reason for Anthony to conduct such patent monitoring.

5. I declare that all statements made in this Declaration of my own knowledge are true and that all statements made on information and belief are believed to be true. I further declare that these statements are 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).

Executed this 16th day of June, 2025.

John Roche

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