

Filed: September 16, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TREASURE GARDEN, INC.,
Petitioner,

v.

ATLEISURE, LLC,
Patent Owner.

Case No. IPR2025-01006
Patent No. 8,104,492

**DECLARATION OF LAUREN KATZENELLENBOGEN IN SUPPORT OF
PETITIONER'S OPPOSITION TO PATENT OWNER'S REQUEST FOR
DISCRETIONARY DENIAL**

I, Lauren Katzenellenbogen, declare as follows:

1. I am a partner with the law firm of Knobbe, Martens, Olson & Bear LLP, counsel of record for Petitioner Treasure Garden, Inc (“Treasure Garden,” or “Petitioner”) in this proceeding. I also represent Treasure Garden in the district court proceeding involving U.S. Patent No. 8,104,492 (the “’492 Patent” or the “Subject Patent”). I have personal knowledge of the matters set forth herein and, if called upon to testify, I could and would testify competently thereto.

2. I submit this Declaration in support for Petitioner’s Opposition to Patent Owner’s Request for Discretionary Denial.

3. Patent Owner sued Petitioner for infringement of the ’492 Patent on May 23, 2024 in the Northern District of Georgia. After the suit began, the parties exchanged written discovery, including infringement and invalidity contentions, and submitted claim construction briefs.

4. As of September 16, 2025, the district court has not adopted the parties’ proposed schedule, appointed a special master, or ruled on Petitioner’s motion to stay.

5. Although the parties have taken written fact discovery in the district court proceeding, they have neither noticed depositions nor served expert reports.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 16, 2025 By: 