

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SOLVENTUM CORPORATION,
Petitioner,

v.

WOULD HEALING TECHNOLOGIES, LLC,
Patent Owner.

IPR2025-01042
Patent 10,639,404

**DECLARATION OF CAITLIN OLWELL, ESQ. IN SUPPORT OF
PETITIONER'S OPPOSITION TO PATENT OWNER'S REQUEST FOR
DISCRETIONARY DENIAL OF INSTITUTION**

I, CAITLIN OLWELL, declare as follows:

1. I am counsel at Akin Gump Strauss Hauer & Feld, LLP (“Akin”). I am over 18 years of age and am competent to give the following declaration. Unless otherwise stated, the below facts are based on my personal knowledge and are true to the best of my knowledge. I declare that I could and would competently testify to the following.

2. Akin represents Solventum Corp. in a district court litigation brought by Wound Healing Technologies Corp., captioned *Wound Healing Technologies Corp. v. Solventum Corp.*, No. 6:24-cv-589 (W.D. Tex filed Nov. 15, 2024).

3. On or about January 17, 2025, in the course of that litigation, the plaintiff Wound Healing Technologies Corp. shipped to Akin a representative sample of a product it allegedly markets that it contends is covered by the claims of U.S. Patent No. 10,639,404.

4. On or about February 6, 2025, I personally observed and photographed that sample.

5. Exhibits A-C attached to this declaration are photos that I took.

6. Exhibit A, below, is a true and correct copy of the photograph I took of the packing slip that was included with the packaged device.

7. Exhibit B, below, is a true and correct copy of the photograph I took of the packaging of the device.

8. Exhibit C, below, is a true and correct copy of the photograph I took of the device after it was removed from its packaging.

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

/ Caitlin Olwell/

Caitlin Olwell, Esq.

Date: 10/2/2025

EXHIBIT

A



1820 Avenue M, Suite 238
Brooklyn, NY 11230
P 718-871-2800 F 718-305-7213
www.woundht.com

Packing Slip

Date	Invoice #
1/17/2025	198484

Bill To
Michael P. Kahn Akin Gump 1 Bryant Park New York, NY 10036

Ship To
Michael P. Kahn Akin Gump 1 Bryant Park New York, NY 10036

Patients Name	P.O. Number

Description	Qty	Rate	Amount
Sample One piece Dressing Kit rectangle	1	0.00	0.00

Subtotal	\$0.00
Sales Tax (8.875%)	\$0.00
Total	\$0.00
Payments/Credits	\$0.00
Balance Due	\$0.00

EXHIBIT

B

LIGHTSTONE — MEDICAL —

Tzoar Negative Pressure Wound Therapy One Piece Dressing - Rectangular 2207

Dressing Size: 27cm x 12.5cm

Pad Size: 22cm x 7.5cm

REF LSM - IN - 2207

Quantity: 1 pc

STERILE

Sterilized using Ethylene Oxide



Don't use if package is
damaged or open.



CAUTION: Consult the Tzoar NPWT
System Instruction for Use for directions on
the safe use.



Single Use Only



Federal law restricts this device to sale by
or on the order of a physician.



Keep Dry



Distributed by:
Lightstone Medical
1600 Rt 70
Suite 208
Lakewood, New Jersey 08701
United States

08-2024
082624
07-2029

Covered by US Patent No. 10,639,404 B2

2012.2002 Rev. B

EXHIBIT

C

