

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PROAMPAC HOLDINGS INC.,

Petitioner

v.

SIGMA TECHNOLOGIES INTERNATIONAL, LLC,

Patent Owner

Case IPR2025-01143
U.S. Patent No. 11,072,148

**DECLARATION OF STEVEN YIALIZIS
IN SUPPORT OF PATENT OWNER'S REQUEST
FOR DISCRETIONARY DENIAL**

1. I am over twenty-one (21) years of age, am competent to give this Declaration, and do so based upon my personal knowledge of the facts stated herein.

2. I am a/the Chief Operating Officer at Sigma Technologies International, LLC (“Sigma”). My responsibilities at this position include overseeing all day-to-day operations, managing R&D initiatives, spearheading customer development efforts, negotiating commercial agreements, and driving the strategic direction of the company.

3. I am familiar with U.S. Patent No. 11,072,148, titled “RECYCLABLE PAPER-CONTAINING PACKAGING WITH RADIANT BARRIER INSULATION” (“the ’148 Patent”), which Sigma owns. I am the co-inventor of said patent and am responsible for the development of the technology, the patent application, and the licensing of the patent for commercialization.

4. I am familiar with an Exclusive Supply Agreement (“ESA”) between Sigma and Pratt Retail Specialties, LLC (“Pratt”) executed in December 2020, under which Sigma references its intent to grant an exclusive patent license to Pratt for the ’148 Patent. I was a signatory to the ESA on behalf of Sigma.

5. I am also familiar with an Exclusive Patent License Agreement (“the License Agreement”) between Sigma and Pratt executed in March 2023, under which Pratt became an exclusive licensee to rights under the ’148 Patent. I was a signatory to the License Agreement on behalf of Sigma.

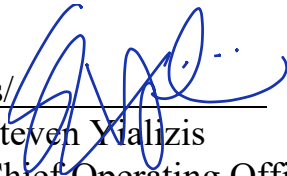
6. The '148 Patent is important to Sigma because it represents a foundational breakthrough in the development of curbside-recyclable thermal packaging. It allows Sigma to compete in a market historically dominated by non-recyclable plastic, non-performing laminate structures, or foil-based insulation – offering a solution that meets both performance and sustainability goals. As a small technology-driven company, this patent is one of our flagship assets and differentiators in the packaging industry.

7. In addition to granting Pratt the exclusive license under the '148 Patent, Sigma invested in the development and commercialization of products covered by the '148 Patent by committing significant internal R&D resources since 2017. This included formulation development, material testing, pilot-scale manufacturing, third-party recyclability validation, and market research. We also conducted iterative prototyping in partnership with packaging customers and provided technical support to Pratt to enable scaled commercialization. These efforts required both financial and personnel commitment across our lean technical and executive teams.

8. Additionally, by virtue of the amount of product that Pratt has purchased from Sigma, Pratt has also invested heavily in the commercialization of products practicing the patented technology.

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

Executed on August 29th, 2025, in Tucson, Arizona.


/s/_____
Steven Yializis
Chief Operating Officer

Sigma Technologies Int'l, LLC