

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

SHENZHEN RONGLIDA TECHNOLOGY CO. LTD.,
Petitioner,

v.

PATHWAY IP LLC,
Patent Owner.

Case No. IPR2025-01231
U.S. Patent No. 7,841,729

**DECLARATION OF A. JUSTIN POPLIN IN SUPPORT OF PATENT OWNER'S
MOTION FOR ADDITIONAL DISCOVERY**

I, A. Justin Poplin, declare as follows:

1. I am a partner at Avek IP, LLC, lead counsel of record for Patent Owner Pathway IP LLC in this proceeding, and I am admitted to practice before the United States Patent and Trademark Office, Reg. No. 53,476. I make this declaration based on personal knowledge and on records maintained in the ordinary course. If called as a witness, I could and would testify competently to the matters stated here.

2. I submit this declaration in support of Patent Owner's Motion for Additional Discovery.

3. On behalf of Patent Owner, I engaged a professional investigation agency to investigate the relationships among certain persons and entities relevant to the real-party-in-interest question in this proceeding, including the named Petitioner Shenzhen Ronglida Technology Co. Ltd., its principals Qingqing Duan and Liu Qingmin, and Shenzhen Neewer Technology Co., Ltd. The

statements in this declaration regarding those relationships reflect what the investigator has informed me, not facts within my own personal knowledge.

4. The investigator's written report is being finalized. Patent Owner will file it as Exhibit 2041 within one week of the filing of this declaration.

5. The investigator has informed me of the following. Qingqing Duan is a financial manager of Shenzhen Neewer and has been employed there for more than a decade. She is considered middle management with decision-making authority within the finance department.

6. Liu Qingmin, who is listed as the supervisor of the named Petitioner, is also an employee in the finance department of Shenzhen Neewer.

7. The named Petitioner, Shenzhen Ronglida, was established by Shenzhen Neewer to operate an Amazon store selling NEEWER-branded products. It did not have its own operations team; its business was handled by the e-commerce team of Shenzhen Neewer.

8. The investigator has further informed me that, according to corporate registration records, Duan was appointed the designated contact person for Shenzhen Xing Ying Da Industry Co., Ltd., a wholly owned subsidiary of Shenzhen Neewer, on December 31, 2025. That date is twenty days after the named Petitioner was deregistered on December 11, 2025.

9. During the May 21, 2026 conference call, Petitioner's counsel acknowledged that the named Petitioner had been deregistered on December 11, 2025, and acknowledged that the statement in Petitioner's Reply that Petitioner is the sole real party in interest was not correct.

10. I have requested from Petitioner's counsel the engagement letters in this matter and information identifying who has paid for and instructed the prosecution of this proceeding. Petitioner's counsel has declined to provide that information.

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

Dated: June 1, 2026

/A. Justin Poplin/

A. Justin Poplin