

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.

U.S. Patent No. 7,841,729

Case No. IPR2025-01231

SECOND DECLARATION OF KAINAN ZHANG

June 4, 2026

I, Kainan Zhang, declare as follows:

1. I am an attorney at law, duly admitted to practice in the People's Republic of China ("China" or the "PRC", and for the purpose of this declaration only, it does not include the Hong Kong Special Administrative Region, the Macau Special Administrative Region, or the Taiwan province).
2. I received an LL.B. degree and a Master of Laws degree from China University of Political Science and Law in 2006 and 2009, respectively. I also received an LL.M. degree from the University of Missouri – Kansas City School of Law in 2010.
3. I joined the law firm Beijing Haiwen & Partners in 2011 and am a partner of the firm. My primary areas of practice include mergers and acquisitions, private equity investment, asset management, financial institutions, and general corporate law.
4. Asian Legal Business recognized me as ALB China Client Choice for two consecutive years (2024-2025). The Legal 500 named me a Leading Partner in its Greater China 2026 rankings.
5. At least in view of the above, I believe I am an expert on Chinese corporate law in terms of the following matter.

6. I can be contacted at zhangkainan@haiwen-law.com and +86 10 8560 6939 (telephone). If called as a witness, I could and would competently testify as follows.
7. I am being compensated for my legal services as an expert in this matter at the hourly rate of USD 550. In addition, I will be reimbursed for all out-of-pocket and documented expenses incurred in connection with this engagement. I have no financial interest in the outcome of the following matter. To the best of my knowledge, after conducting a reasonable internal inquiry within my firm, neither I nor my firm holds a financial interest in any of the parties to this proceeding or has a professional relationship that would create a conflict of interest in this matter.
8. I previously made a declaration in this case dated May 9, 2026.
9. In the Exhibit 1022 in this case, which is the PRC Legal Declaration of Qiao Li, it says that “Under the laws of the People’s Republic of China, after a limited liability company is deregistered, its shareholder may, as the successor to the company’s remaining property rights, take the place of the company and continue to participate in pending litigation that existed prior to the company’s deregistration.” (“Qiao Li’s Summary”) Regardless of whether or not Qiao Li’s Summary is correct, Qiao Li’s Summary focuses on the rights of shareholders after a Chinese company is deregistered under PRC law.

10. Pursuant to PRC law, unless under certain proven circumstances where the shareholders of a limited liability company will bear liability arising from the failure to conduct lawful liquidation or, in the case of simplified deregistration, from a false undertaking regarding the absence of outstanding debts of the Chinese company, liabilities of the company do not automatically transfer to its shareholders upon deregistration.
11. I understand there is related litigation where Shenzhen Ronglida Technology Co. Ltd. (“Ronglida”, a limited liability company in China prior to its deregistration) has been accused of infringing the patent at issue in the Patent Office’s Inter Partes Review. If the patent claims are not invalidated in the Inter Partes Review and the related litigation continues, under PRC law Duan Qingqing, as the sole shareholder of Ronglida prior to its deregistration, would not be automatically liable for the infringement of Ronglida since the liabilities of Ronglida did not automatically transfer to Duan Qingqing when Ronglida was deregistered.

I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge, information and belief, the foregoing is true and correct.

Dated: June 4, 2026

Respectfully Submitted,

/s/ Kainan Zhang