

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

QINGQING DUAN,
Petitioner,

v.

PATHWAY IP LLC,
Patent Owner.

**Case IPR2025-01231
Patent 7,841,729 B2**

PATENT OWNER'S NOTICE OF DEPOSITION OF QINGQING DUAN

Pursuant to 37 C.F.R. § 42.53(d)(4) and the Board's Order granting Patent Owner's Motion for Additional Discovery (Paper 29), Patent Owner Pathway IP LLC hereby submits this Notice of Deposition of Petitioner Qingqing Duan.

Time. As agreed by counsel for the parties, the deposition will begin on Thursday, August 13, 2026, at 9:00 a.m. Eastern Time, and will continue from day to day until completed.

Place. The deposition will be conducted remotely by videoconference. Ms. Duan will appear from Hong Kong pursuant to the parties' agreement. Videoconference access information will be circulated to counsel of record in advance of the deposition. Ms. Duan's address for purposes of this Notice is care of counsel of record for Petitioner at the address designated in Petitioner's mandatory notices.

Scope. The deposition is taken pursuant to the Board's Order granting Patent Owner's Motion for Additional Discovery (Paper 29) to address whether all real parties in interest have been identified as required by 35 U.S.C. § 312(a)(2). Consistent with the subjects identified in Patent Owner's Motion, the deposition will address the funding, control, and direction of this proceeding; Ms. Duan's role at the former named Petitioner, Shenzhen Ronglida Technology Co. Ltd.; her employment with and role at Shenzhen Neewer Technology Co., Ltd.; her role with Shenzhen Xing Ying Da Industry Co., Ltd.; any relationship or association between Ms. Duan and the entities identified in Patent Owner's Preliminary Response as real parties in interest, including the other Neewer Defendants in Pathway IP LLC v. The Individuals, No. 1:24-cv-05218 (N.D. Ill.); the extent to which any such person or entity funded, controlled, or directed this proceeding; and any continuing interest of any such person or entity in this proceeding. The deposition will also include cross-examination of Ms. Duan concerning her declaration (Ex. 1020).

Exhibits. Patent Owner may rely upon the papers and exhibits of record bearing on the real-party-in-interest issue, including Exhibits 1020-1023; documents produced by Petitioner pursuant to Paper 29 that are marked or used as exhibits during the deposition; and documents used for impeachment, authentication, or refreshing recollection.

Manner. The deposition will be taken before an officer authorized to administer oaths pursuant to 35 U.S.C. § 23 and will be recorded by at least stenographic means. An interpreter will be provided.

Dated: August 4, 2026

Respectfully submitted,
/A. Justin Poplin/
A. Justin Poplin, Reg. No. 53,476
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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on August 4, 2026, a complete copy of the foregoing PATENT OWNER'S NOTICE OF DEPOSITION OF QINGQING DUAN was served by electronic mail upon counsel for Petitioner at the email addresses authorized in Petitioner's mandatory notices.

/A. Justin Poplin/

A. Justin Poplin, Reg. No. 53,476