UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TOP GLORY TRADING GROUP INC. and

DP DREAM PAIRS INC.,

Petitioners,

v.

COLE HAAN LLC,

Patent Owner.

_____

Case IPR2025-01394
Patent No. 11,041,262

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DECLARATION OF JONATHAN BRADFORD IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 11,041,262

1. I, Jonathan Bradford, make the following Declaration pursuant to 28 U.S.C. § 1746: I am a Senior IP Paralegal at the law firm of Ropes & Gray LLP.

2. I provide this Declaration in connection with the above-identified *Inter Partes* Review proceeding that is before the United States Patent and Trademark Office ("USPTO"). Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

3. Ex. 1001 is a true and correct copy of U.S. Patent No. 11,041,262 ("'262" or "'262 patent"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

4. Ex. 1002 is a true and correct copy of File History of U.S. Patent No. 11,041,262 ("'262FH"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

5. Ex. 1004 is a true and correct copy of U.S. Patent Publication No. 2010/0154256 ("Dua"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers

on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

6. Ex. 1005 is a true and correct copy of U.S. Patent No. 6,931,762 ("'762" or "'762 patent"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

7. Ex. 1006 is a true and correct copy of U.S. Patent No. 6,910,288 ("'288"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

8. Ex. 1007 is a true and correct copy of Alan J. Flusser, *Clothes and the Man: The Principles of Fine Men's Dress* (1985) ("Flusser"), which was obtained from the New York Public Library at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

9. Ex. 1008 is a true and correct copy of U.S. Patent No. 7,949,570 ("Litke"), which was obtained from the USPTO's Patent Center system. This

document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

10. Ex. 1009 is a true and correct copy of U.S. Patent Pub. No. 2014/0237856 ("Podhajny"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

11. Ex. 1010 is a true and correct copy of U.S. Patent Pub. No. 2014/0109286 ("Blakely"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

12. Ex. 1011 is a true and correct copy of U.S. Patent No. 10,327,511 ("'511" or "'511 patent"), which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

13. Ex. 1012 is a true and correct copy of File History of U.S. Patent No. 10,327,511 ("'511FH"), which was obtained from the USPTO's Patent Center

system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

14. Ex. 1015 is a true and correct copy of U.S. Patent No. 8,028,440, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

15. Ex. 1016 is a true and correct copy of U.S. Patent Pub. 2015/0313316, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

16. Ex. 1017 is a true and correct copy of U.S. Patent Pub. 2013/0260104, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

17. Ex. 1018 is a true and correct copy of Complaint for Patent Infringement in *Cole Haan LLC v. Top Glory Trading Group Inc. et al*., 2:25-cv-

00176 (D.N.J.). This document was downloaded at my direction from the United States Court's Public Access to Court Electronic Records ("PACER") system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

18. Ex. 1019 is a true and correct copy of *Man-Made Fiber and Textile Dictionary*, Fourth Edition (Issued 1978, Reprinted 1983), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

19. Ex. 1020 is a true and correct copy of Wingate, *Fairchild's Dictionary of Textiles*, Sixth Edition (1979), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

20. Ex. 1021 is a true and correct copy of H. Stoll GmbH & Co, *Stoll Training: Manual Flat Knitting Machine* (2013), which was obtained from https://nfc.stoll.com/faq/223788_01_train_learner_en.pdf at my direction. This document has been marked with an exhibit label and page numbers on each page at

the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

21. Ex. 1022 is a true and correct copy of American & Efird, *Footwear Glossary: Shoe Construction Terminology* (2008), which was obtained at my direction and is available at the following link:

https://www.amefird.com/wp-content/uploads/2010/01/2Footwear-Glossary-Shoe-Construction-03-08-08.pdf

This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

22. Ex. 1023 is a true and correct copy of David J. Spencer, KNITTING TECHNOLOGY: A COMPREHENSIVE HANDBOOK AND PRACTICAL GUIDE (3rd ed.) (Woodhead Publishing Limited, Cambridge, England 2001), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

23. Ex. 1024 is a true and correct copy of Wonseok Choi, *Three Dimensional Seamless Garment Knitting on V-Bed Flat Knitting Machines*, 4 J. TEXTILE AND APPAREL, TECH. AND MGMT., 1-33 (2005), which was obtained at my direction. This document has been marked with an exhibit label and page numbers

on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

24. Ex. 1025 is a true and correct copy of National Judicial Caseload Profile, 2024, overall and New Jersey, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

25. Ex. 1026 is a true and correct copy of Hong et al., *The Development of 3D Shaped Knitted Fabrics For Technical Purposes on a Flat Knitting Machine*, 19 Indian Journal of Fibre & Textile Research, 189-94 (September 1994), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

26. Ex. 1027 is a true and correct copy of Lewis et al., *A Machine Knitter's Guide To Creating Fabrics* (1986), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

27. Ex. 1028 is a true and correct copy of Complete Textile Glossary, Celanese Acetatete LLC (2001), which was obtained at my direction. This

document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

28. Ex. 1029 is a true and correct copy of U.S. Patent No. 1,803,554, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

29. Ex. 1030 is a true and correct copy of U.S. Patent No. 1,841,518, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

30. Ex. 1031 is a true and correct copy of U.S. Patent No. 2,675,631, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

31. Ex. 1032 is a true and correct copy of U.S. Patent No. 5,345,638, which was obtained from the USPTO's Patent Center system. This document has

been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

32. Ex. 1033 is a true and correct copy of U.S. Patent No. 2,440,393, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

33. Ex. 1034 is a true and correct copy of U.S. Patent No. 2,147,197, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

34. Ex. 1035 is a true and correct copy of U.S. Patent No. 2,400,692, which was obtained from the USPTO's Patent Center system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

35. Ex. 1037 is a true and correct copy of European Patent No. 1338690A1, which was obtained from the European Patent Office Espacenet

Patent search system. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

36. Ex. 1038 is a true and correct copy of A. W. Koester, *Fashion Terms: Apparel Fabric Glossary* (1992), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

37. Ex. 1039 is a true and correct copy of Sabit Adanur, WELLINGTON SEARS HANDBOOK OF INDUSTRIAL TEXTILES (Johnston Industries Group 1995), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

38. Ex. 1040 is a true and correct copy of D. Ann Gioello, *Understanding Fabrics: From Fiber to Finished Cloth* (1982), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

39. Ex. 1041 is a true and correct copy of Cammy Sessa, "*Clothes and the Man" by Flusser*, The Virginian-Pilot, Sept. 7, 1995, at 37, which was obtained at my direction and is available at the following link:

https://pilotonline.newsbank.com/sign-up?docref=doc/image/v2%253A146D908D09F2E7FE%2540NGPA-VAVP-1811A5D2D47F25A0%25402449968-18109F1A6F5E4F71%254036-18109F1A6F5E4F71%2540

This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

40. Ex. 1042 is a true and correct copy of Phyllis G. Tortora, *Understanding Textiles* 344 (4th ed. 1992), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

41. Ex. 1043 is a true and correct copy of Jess Power, *Functional to Fashionable: Knitwear's Evolution Throughout the Last Century and into the Millennium*, 5 J. Textile and Apparel, Tech. and Mgmt. 1-16 (2006), which was obtained at my direction. This document has been marked with an exhibit label

and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

42. Ex. 1044 is a true and correct copy of *Advances in Knitting Technology* (K.F. Au ed. 2011), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

43. Ex. 1045 is a true and correct copy of William Morrow, *Best Sellers for Winter*, Publishers Weekly, Sept. 20, 1985, at 97, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

44. Ex. 1046 is a true and correct copy of Alan J. Flusser, *Getting a Solid Footing*, The New York Times Magazine, Sept. 13, 1981, § 6, at 98, which was obtained at my direction and is available at the following link: https://www.nytimes.com/1981/09/13/magazine/getting-a-solid-footing.html This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

45. Ex. 1047 is a true and correct copy of Alan Flusser, *Dressing the Man*, 188-208, HarperCollins, 2002, which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document., which was obtained at my direction.

46. Ex. 1048 is a true and correct copy of Michael Gross, *Dressing by the Books: Getting the Word to Men,* The New York Times, Oct. 19, 1985, § 1, at 52, which was obtained at my direction and is available at the following link: https://www.nytimes.com/1985/10/19/style/dressing-by-the-books-getting-the-word-to-men.html

This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

47. Ex. 1049 is a true and correct copy of Internet Archive Capture dated October 12, 1985, of "Clothes and The Man; The Principles of Fine Men's Dress", which was obtained at my direction and is available at the following link: https://web.archive.org/web/20150105224030/http://www.amazon.com:80/Clothes-Man-Principles-Fine-Dress/dp/0394546237

This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

48. Ex. 1051 is a true and correct copy of *Spandex Technology* (1965), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document., which was obtained at my direction.

49. Ex. 1052 is a true and correct copy of *Pointelle*, *Meriam-Webster's Collegiate Dictionary* (10th ed. 2001), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document., which was obtained at my direction.

50. Ex. 1053 is a true and correct copy of *Pointelle*, *The Oxford American College Dictionary* (2002), which was obtained at my direction. This document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document., which was obtained at my direction.

51. Ex. 1054 is a true and correct copy of U.S. Design Patent No. D905,386, which was obtained from the USPTO's Patent Center system. This

document has been marked with an exhibit label and page numbers on each page at the bottom right corner. However, no alterations, other than these noted markings, have been made to this document.

52. Certain pages have been resized to 8.5 x 11 inches. No content was removed by this resizing.

53. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further 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 18 U.S.C. § 1001. If called to testify as to the truth of the matters stated herein, I could and would testify competently.

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

Executed this 3rd day of September, 2025, in Boston, Massachusetts.

/Jonathan Bradford/
Jonathan Bradford
ROPES & GRAY LLP