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 IPR2025-01395
Patent No. D768,969

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DECLARATION OF ALEXANDER MOROZOV IN SUPPORT OF PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

1. I, Alexander Morozov, make the following Declaration pursuant to 28 U.S.C. § 1746: I am an IP Litigation Paralegal at the law firm of Sheppard, Mullin, Richter & Hampton 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. 1034 is a true and correct copy of the Amended Complaint for Patent Infringement in *Cole Haan LLC v. Top Glory Trading Group Inc. et al*., 2:25-cv-00176-ES-SDA, Dkt. No. 8 (D.N.J.). 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. 1035 is a true and correct copy of *Factors Affecting Human Visual Behavior and Preference for Sneakers - An Eye-Tracking Study*, Frontiers in Psychology (2022). 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. 1036 is a true and correct copy of Solereview Editors, *Cole Haan OriginalGrand Wingtip Review* (Mar. 19, 2022), which was obtained from https://www.solereview.com/cole-haan-originalgrand-wingtip-oxford-review 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.

6. Ex. 1037 is a true and correct copy of Sneaker Freaker, *Lunargrand Wingtip by Cole Haan (Nike Lunar)* (Feb. 9, 2012), which was obtained from https://www.sneakerfreaker.com/news/lunargrand-wingtip-by-cole-haan-nike-lunar at my direction. Pages 1 through 9 of the exhibit each contain an individual image from the slideshow at the top of the captured webpage, together with the text appearing on page 1 of the printout. Pages 10 and 11 of the exhibit contain the text from pages 2 and 3 of the printed webpage, respectively. 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. 1038 is a true and correct copy of Matt Sebra, *This Just In: The Evolution of the Cole Haan Wingtip* (Feb. 16, 2012), which was obtained from https://www.gq.com/story/cole-haans-evolution 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.

8. Ex. 1039 is a true and correct copy of Aaron Hope, *Nike LunaRacer+ 3 – Vivid Blue – Volt – Black* (Jan. 17, 2014), which was obtained from https://sneakernews.com/2014/01/19/nike-lunaracer-3-vivid-blue-volt-black 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. 1040 is a true and correct copy of Nightwing2302, *Inside Access: The Story of Nike Lunarlon* (Dec. 10, 2013), which was obtained from https://weartesters.com/inside-access-the-story-of-nike-lunarlon 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.

10. Ex. 1041 is a true and correct copy of the source image of the Cole Haan, OriginalGrand Wingtip Oxford (Style #W01559) (Feb. 7, 2016) from page 2 of Ex. 1042, which was obtained from https://web.archive.org/web/20160207184312/http:/www.colehaan.com/dw/image/v2/AALO_PRD/on/demandware.static/-/Sites-itemmaster_colehaan/default/dw2146376d/images/large/W01559_A.jpg?sw=2000 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.

11. Ex. 1042 is a true and correct copy of Cole Haan, OriginalGrand Wingtip Oxford (Style #W01559) (Aug. 17, 2016), which was obtained from https://web.archive.org/web/20160817095530/http:/www.colehaan.com/%C3%B8riginalgrand-wingtip-oxford-black/W01559.html at my direction. Pages 1, 5, 9, 13, 17, 21 of the exhibit each contain an individual image from the image selection pane at the top of the captured webpage, together with the text appearing on page 1 of the printout. 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. 1043 is a true and correct copy of Deepika Babu & Bruno Bordoni, *Anatomy, Bony Pelvis and Lower Limb: Medial Longitudinal Arch of the Foot* (Sept. 10, 2024), which was obtained from https://ncbi.nlm.nih.gov/books/NBK562289/?report=printable 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.

13. Ex. 1044 is a true and correct copy of Science Insights, *What Is Arch Support in Shoes and Why It Matters* (May 3, 2026), which was obtained from

https://scienceinsights.org/what-is-arch-support-in-shoes-and-why-it-matters 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.

14. Ex. 1045 is a true and correct copy of BazaarVoice, *Talking to Strangers: How Social Influences Millennials' Shopping Decisions*, which was obtained from https://web.archive.org/web/20151231021440/https:/resources.bazaarvoicecampaigns.com/static/download/Bazaarvoice_Millennials_Infographic.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.

15. Ex. 1046 is a true and correct copy of Matt Powell, *Sneakernomics: What's Next For "Athleisure"?* (Mar. 6, 2015), which was obtained from https://www.forbes.com/sites/mattpowell/2015/03/06/sneakernomics-whats-next-for-athleisure 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.

16. Ex. 1047 is a true and correct copy of Dan-Dan Xu et al., *A Study on Perception of Visual–Tactile and Color–Texture Features of Footwear Leather for*

Symmetric Shoes (July 22, 2023). 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. 1048 is a true and correct copy of Cole Haan, Men's ØriginalGrand Remastered Wingtip Oxfords, which was obtained from https://www.colehaan.com/products/mens-originalgrand-remastered-wingtip-oxfords-c39599 at my direction. Pages 1, 5, 9, 13, and 17 of the exhibit each contain an individual image from the image selection pane at the top of the captured webpage, together with the text appearing on page 1 of the printout. 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. 1049 is a true and correct copy of Cole Haan, Men's ØriginalGrand Remastered Waterproof Chukka Boots, which was obtained from https://www.colehaan.com/products/mens-originalgrand-waterproof-chukka-boots-c38686 at my direction. Pages 1, 2, 6, 10, 14, and 18 of the exhibit each contain an individual image from the image selection pane at the top of the captured webpage, together with the text appearing on page 1 of the printout. 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. 1050 is a true and correct copy of Cole Haan, Men's ØriginalGrand Remastered Wingtip Oxfords, which was obtained from https://www.colehaan.com/products/mens-originalgrand-remastered-wingtip-oxfords-c39600 at my direction. Pages 1, 5, 9, 13, 17, and 21 of the exhibit each contain an individual image from the image selection pane at the top of the captured webpage, together with the text appearing on page 1 of the printout. 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. 1051 is a true and correct copy of the Transcript of Lance Rake, *Chongqing Qiulong Tech., et al. v. Tanli Power Tech., et al*. 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. 1052 is a true and correct copy of the Merriam-Webster's Elementary Dictionary, *Undulating* (2009). 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.

Top Glory - Ex. 1057, Page 00008

22. Ex. 1053 is a true and correct copy of Encyclopedia Britannica, *Fluting and Reeding* (Sept. 5, 2015), which was obtained from https://web.archive.org/web/20150905191329/https://www.britannica.com/technology/fluting-and-reeding 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. 1054 is a true and correct copy of Cole Haan, Original Grand Collection (Dec. 1, 2015), which was obtained from https://web.archive.org/web/20151201083310/http://www.colehaan.com/mens-originalgrand 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. 1055 is a true and correct copy of Cole Haan, Original Grand Collection (Mar. 13, 2016), which was obtained from https://web.archive.org/web/20160313195245/http://www.colehaan.com/mens-originalgrand 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. 1056 is a true and correct copy of Anatomy, Bony Pelvis and Lower Limb Arches of the Foot, Figure 4, which was obtained from

https://www.ncbi.nlm.nih.gov/books/NBK587361/figure/article-149120.image.f4

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

27. 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.

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

Executed this 11th day of August, 2026, in Nashua, New Hampshire.

/s/ Alexander Morozov

Alexander Morozov
IP Litigation Paralegal
Sheppard, Mullin, Richter & Hampton LLP