

EXHIBIT 2012

Declaration of Joseph Donabed

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1. My name is Joseph Donabed. I am the Director of Research and Development at Enviro Tech Chemical Services, Inc. (“Enviro Tech”). I have worked at Enviro Tech since August 2011.
2. I am submitting this Declaration in support of Enviro Tech’s Discretionary Denial Briefs in IPR Nos. IPR2025-01458, -01459, -01471, and -01472.
3. My tenure at Enviro Tech overlapped with that of Brent Bankosky. Mr. Bankosky worked as the Chief Operating Officer and the President while he was employed by Enviro Tech.
4. Mr. Bankosky worked in the Modesto, California office of Enviro Tech, the same office where I worked and still work.
5. The Modesto, California Enviro Tech office displays framed copies of the Enviro Tech patents on its lobby walls.
6. I am in possession of photos taken of this lobby area during Mr. Bankosky’s tenure with Enviro Tech. The general presence of the patent displays is captured in some of these photos, such as this one:



7. The framed patents include the members of the peracetic acid patent family, and the photos in my possession include images of at least U.S. Patent Nos. 9,363,997 and 9,730,443.





8. I have personally helped to hang these patents on the wall, and it is customary practice for the framed patent to be hung on the wall within one year of its date of issuance.

9. Therefore, it is my belief that the framed copy of U.S. Patent No. 8,546,449, which issued on October 1, 2013, was placed on the wall by October of 2014; that the framed copy of U.S. Patent No. 9,363,997, which issued on June 14, 2016, was placed on the wall by June of 2017; and that the framed copy of U.S. Patent Nos. 9,730,443 and 9,737,072, which issued on August 15, 2017 and August 22, 2017, respectively, were placed on the wall by no later than August 2018.

10. In order to enter and exit the Enviro Tech office, employees would enter through the door shown in the photo below and walk past the patents displayed on the walls in order to access their offices and would pass the same wall when they exited the building.



11. Each of the photos shown above is a photo from my personal phone. The metadata provided for each image was also taken from my phone and shows the date when the photos were taken.

12. The captured metadata for the picture shown in paragraph 9 indicates that it was taken in 2015, and therefore that the patent wall was in place while Mr. Bankosky was employed at Enviro Tech.



Add a Caption



Found in Contacts
Is This Joseph Donabed?

Yes



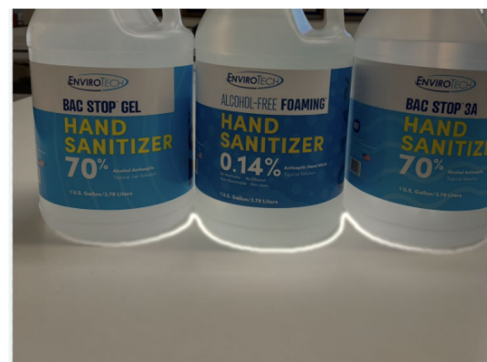
Sunday • Nov 22, 2015 • 5:25 PM

[Adjust](#)



IMG_3281

13. Another image of the same wall, captured five years later, in 2020, shows that the collection of patents on the wall has expanded:



Add a Caption

Wednesday • Aug 12, 2020 • 10:13 AM

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IMG_1963

14. Mr. Bankosky worked in the Modesto office from 2013 to 2022.

15. Mr. Bankosky, therefore, certainly saw patents that are members of the peracetic acid patent family hanging on the wall on a daily basis for several years, based on the custom of hanging the framed patents within a year of issuance.

16. As a result, I believe Mr. Bankosky had actual knowledge of the Enviro Tech patent family related to peracetic acid.

17. My tenure at Enviro Tech also overlapped with the tenure of Todd Wiseman. Mr. Wiseman worked in sales, including as Director of Sales at Enviro Tech and as the North American Sales Director of Professional Hygiene for Arxada, but did not work in the Modesto, California office.

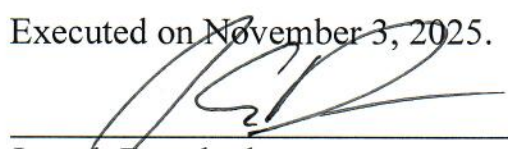
18. In his role as North American Sales Director of Professional Hygiene for Arxada, Mr. Wiseman was familiar with Enviro Tech's hygiene offerings, including peracetic acid products, and would likely have been aware of Enviro Tech's patents related to peracetic acid.

19. I was included in communications regarding the Enviro Tech peracetic acid patents and I recall Mr. Wiseman also being included in the same communications.

ATTESTATION

I declare that all statements made herein of my own knowledge are true to the best of my knowledge and that all statements made on information and belief are believed to be true. I further declare 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 Section 1001 of Title 18 of the United States Code.

Executed on November 3, 2025.



Joseph Donabed