

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Beatbot Technology (USA) Co. Ltd.,
Petitioner

v.

Zodiac Pool Systems LLC
Patent Owner

Case No. IPR2026-00200, IPR2026-00201, IPR2026-00202
Patent Nos. 11,003,191, 11,262,766, 11,880,207

DECLARATION OF MISTY MADRID

I, Misty Madrid, declare and state as follows.

1. My name is Misty Madrid. I am over the age of twenty-one years, of sound mind, and competent in all respects to make this Declaration. I have personal knowledge of the facts stated herein, and if called upon to do so, I could and would competently testify hereto.

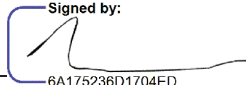
2. I am the VP, Human Resources of Zodiac Pool Systems LLC (“Zodiac”). I am based in Zodiac’s Atlanta office at 2077 Convention Center Concourse, Suite 300, Atlanta, GA 30337.

3. Zodiac currently has 623 employees based in the United States.

4. Zodiac is part of the same corporate umbrella as multiple other companies that produce pool-related products for sale in the United States, including Cover-Pools LLC, S.R. Smith, LLC, Custom Molded Products, LLC, Fluidra USA, LLC, and Taylor Water Technologies LLC, which collectively have more than 1,000 employees based in the United States at facilities in the following states: Georgia, California, Arizona, Utah, Ohio, Oregon, Tennessee, Florida, Washington, and Maryland, as well as remotely.

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

Executed on March 27, 2026.

Signed by:

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Misty Madrid