

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.: IPR2026-00201

U.S. Patent No. 11,880,207 B2

DECLARATION OF WEI YUAN, PH.D.

I, Wei Yuan, declare as follows:

1. I am an attorney at Perkins Coie LLP and serve as counsel of record for Petitioner Beatbot Technology (USA) Co. Ltd. (“Beatbot”) in this proceeding. I am also counsel of record for Beatbot in the related District Court litigation, Beatbot Technology (USA) Co. Ltd. v. Zodiac Pool Systems LLC, Case No. 3:25-cv-01946, pending in the United States District Court for the Southern District of California.

2. I submit this declaration in support of Petitioner’s Response to Patent Owner’s Request for Discretionary Denial in the above-captioned proceeding.

3. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could and would competently testify to them. The facts stated herein are based on my personal knowledge, my review of publicly available records, my review of records maintained by my firm in connection with our representation of Beatbot, and my review of filings and orders entered in the District Court litigation.

4. On July 17, 2025, Patent Owner Zodiac Pool Systems LLC sent a cease and desist letter to Beatbot alleging infringement of multiple patents. See Exhibit 2022. On July 31, 2025, Beatbot filed a declaratory judgment action against Patent Owner Zodiac in the United States District Court for the Southern District of California, seeking a declaration of non-infringement of United States

Patent Nos. 11,880,207 (“the ’207 Patent”); 11,262,766 (“the ’766 Patent”); and 11,003,191 (“the ’191 Patent”) (collectively, the “asserted patents”).

5. On December 9, 2025, Patent Owner served Beatbot with preliminary infringement contentions identifying various claims of the asserted patents against Beatbot’s AquaSense 2 Ultra product.

6. On March 23, 2026, Beatbot and Patent Owner jointly filed in the District Court a Joint Claim Construction Hearing Statement and Joint Claim Construction Worksheet. Patent Owner’s counsel signed and joined in the Joint Claim Construction Hearing Statement. Attached as Exhibit 1013 is a true and correct copy of the Joint Claim Construction Hearing Statement (Dkt. 35).

7. On January 28, 2026, Beatbot filed a motion to stay the District Court litigation pending resolution of the IPR proceedings. Patent Owner opposed that motion. Attached as Exhibit 1014 is a true and correct copy of Patent Owner’s Opposition to Beatbot’s Motion to Stay.

8. After Patent Owner filed that Opposition, Petitioner filed a Sotera-plus stipulation in this proceeding. See Paper 6.

9. Attached as Exhibit 1015 is a true and correct copy of pages from Fluidra’s corporate website, available at <https://www.fluidrausa.com/en/company>, captured on April 16, 2026.

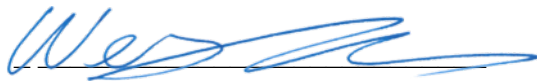
10. Attached as Exhibit 1016 is a true and correct copy of Fluidra's 2025 Annual Report. Fluidra states that "The Group's market capitalisation at 31 December 2025 is €4,450 million[.]" Exhibit 1016 at 29. As of the date of this declaration, the Euro-to-U.S. Dollar exchange rate is approximately 1.17, making Fluidra's stated market capitalization approximately \$5.207 billion U.S. Dollars.

11. Attached as Exhibit 1017 are true and correct photographs of the retail packaging of the Polaris Freedom SC Cordless Robotic Pool Cleaner.

12. On December 9, 2025, Zodiac served its preliminary infringement contentions on Beatbot in the district court litigation. Attached as Exhibit 1020 is a true and correct copy of Zodiac's preliminary infringement contentions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 28, 2026 U.S. Eastern Time, in Shenzhen, China.



Wei Yuan, Ph.D.