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.: IPR2026-00202

U.S. Patent No. 11,003,191 B2

DECLARATION OF XINGDI LI

I, Xingdi Li, declare as follows:

1. I am IP Manager at Xingmai Innovation Technology (Suzhou) Co., Ltd. ("Xingmai"). I submit this declaration in support of Petitioner's Response to Patent Owner's Request for Discretionary Denial in the above-captioned proceeding.

2. 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 business records maintained by Xingmai and Beatbot Technology (USA) Co. Ltd. ("Beatbot") in the ordinary course of business, and information made available to me in my capacity at Xingmai.

3. In my role at Xingmai, I am responsible for managing the company's intellectual property portfolio, including patent prosecution, IP strategy, and IP-related litigation support. In that capacity, I am familiar with Xingmai's and Beatbot's corporate history, organizational structure, employee headcount, product development, manufacturing operations, and U.S. commercial activities.

4. Beatbot was founded in September 2023 and incorporated in Texas, and maintains its U.S. office at 7307 Peek Rd., Richmond, Texas, 77407.

5. Xingmai was founded in July 2022 and incorporated under the laws of the People's Republic of China, with its principal place of business in Suzhou, China.

6. As of April 28, 2026, Beatbot, together with its real parties-in-interest including Xingmai, employs fewer than 500 persons in total worldwide. This headcount includes all full-time employees, part-time employees, and contractors counted under the affiliation rules of 13 C.F.R. §121.103, if applicable.

7. Beatbot operates a U.S. customer support line accessible to U.S. customers. The phone number for that support line is (833) 702-4399, and it is staffed from 9:00 AM to 6:00 PM CST by remote personnel dedicated to U.S. customers.

8. Beatbot has conducted pop-up retail demonstrations in U.S. cities, including Miami, Florida and Scottsdale, Arizona.

9. Beatbot is a sponsor of the United States SailGP Team.

10. Beatbot maintains three (3) U.S.-based personnel who perform functions such as U.S. sales and marketing user research.

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, at Suzhou, China.

Xingdi Li

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