UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TRICAM INDUSTRIES, LLC
Petitioner

v.

LITTLE GIANT LADDER SYSTEMS, LLC
Patent Owner

Post-Grant Review of
U.S. Patent No. 12,359,506

DECLARATION OF BENJAMIN P. WILLIAMS IN SUPPORT OF PETITION FOR POST GRANT REVIEW OF U.S. PATENT NO. 12,359,506

I, Benjamin P. Williams, do hereby state and declare as follows:

1. My name is Benjamin P. Williams. I am over the age of 18 and competent to make this Declaration. I make this declaration based on my own personal knowledge.

2. I am Senior Vice President, Product, for Tricam Industries, LLC. In that position, I am part of Tricam's design team responsible for designing Tricam products, including Tricam's Gorilla Ladders line of products. I have a Bachelor of Science in Electrical Engineering degree, and have 19 years of product design experience.

3. I have reviewed the Declaration of N. Ryan Moss of June 24, 2024, the Declaration of N. Ryan Moss of November 25, 2024, and the Declaration of Brian Russell of December 2, 2024, submitted during prosecution of the subject patent. EX1019; EX1021; EX1024. In these declarations Mr. Moss and Mr. Russell claim that Tricam "copied" the patented design by getting access to Little Giant's prints through our supplier PICA and then using them to come up with Tricam's own hinge hanger design implemented on some of Tricam's Gorilla Ladders products. I can corroborate the statements of Joseph P. Foley in his declaration that these allegations are untrue, as well as his description of our development efforts that led to the GLXF-5B and GMPXA-18(C) products, and the designs disclosed in U.S.

Design Patent No. D833,643, U.S. Patent No. 11,505,994, and U.S. Patent No. 12,523,097. EX1004.

4. I am aware that during prosecution Little Giant generally has alleged copying by Tricam of Little Giant designs. I did not get access to any Little Giant prints or receive any information from PICA or anyone else about Little Giant designs when working with others on Tricam's design team in developing any of the products I mentioned above or making the inventions in the patents listed above. And, to my knowledge, nor did anyone else at Tricam. The claims of Mr. Moss and Mr. Russell in their declarations are simply false, and are just unfounded speculation. The designs of the GLXF-5B and GMPXA-18(C) products, and the designs disclosed in U.S. Design Patent No. D833,643, U.S. Patent No. 11,505,994, and U.S. Patent No. 12,523,097 were entirely conceived by me and other joint inventors named in those patents.

5. I am further aware that Mr. Russell specifically alleged that Tricam "has a long history of copying innovations and infringing intellectual property of Little Giant Ladder Systems." Mr. Russell performed no analysis of copying or infringement. Rather, he just made the allegations without providing a single example to support his bold claims.

6. Little Giant has a history of making unfounded allegations of copying and infringement by Tricam. In fact, in a lawsuit that recently concluded, Little Giant accused Tricam of infringing one of its ladder patents and of copying a different Little Giant design. The district court, however, disagreed. The district court dismissed Little Giant's lawsuit at the summary judgment stage, finding no infringement by Tricam. When Little Giant appealed that decision, the court of appeals affirmed the district court's judgment. *Little Giant Ladder Sys., LLC. V. Tricam Indus., Inc.*, 2026 WL 305021 (Fed. Cir. Feb. 5, 2026). A copy of the Opinion is attached as EX1030.

7. I 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 Section 1001 of Title 18 of the United States Code.

Dated: April 14, 2026

Benjamin P. Williams