

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMERICA UGREEN LIMITED,
Petitioner,

v.

SARIANA LLC,
Patent Owner.

Case No. PGR2026-00062
U.S. Patent No. 12,436,567

DECLARATION OF ALAN TURKSU IN SUPPORT
OF REQUEST FOR DISCRETIONARY DENIAL

I, Alan Turksu, declare as follows:

I. BACKGROUND AND QUALIFICATIONS

1. I am the Chief Executive Officer of Sariana LLC (“Sariana”), the Patent Owner in this proceeding. Sariana does business under the registered trademark SATECHI. I have been Sariana’s Chief Executive Officer since I co-founded the company, and I have held that title for more than twenty years.

Ex. 2011 ¶ 1. I submit this declaration in support of Patent Owner’s Request for Discretionary Denial. The statements in this declaration are based on my own personal knowledge, on my participation in the events described, or on Sariana’s business records that I reviewed in preparing this declaration and that are kept in the ordinary course of Sariana’s business.

2. I am a named inventor on more than seventy granted United States patents relating to accessories for computers and mobile devices, and I am a named inventor on the application that issued as U.S. Patent No. 12,436,567 (the “’567 patent”), U.S. Application No. 19/044,270. Ex. 2011 ¶¶ 2–3.

3. I submitted an earlier declaration in this patent’s prosecution, under 37 C.F.R. § 1.132, on July 8, 2025. A true and correct copy of that declaration is Exhibit 2011. The facts I stated in it were true when I signed it and remain true.

II. SARIANA AND ITS FOUNDING

4. Brock Guclu and I founded Sariana in December 2005. We had been friends since college, and we started the company in a garage in San Diego, California.

5. Sariana has designed and sold consumer-electronics accessories under the Satechi brand from San Diego since 2005. Ex. 2011 ¶ 1. Our product line includes docking stations and hubs, stands, adapters, power chargers, keyboards, headphones, and wireless devices, and Sariana has received numerous industry awards for these products. Ex. 2011 ¶ 1.

6. Sariana's headquarters has always been in San Diego, and its industrial-design, engineering, research-and-development, and product-development functions are located there.

III. THE '567 PATENT AND SATECHI PRODUCTS

7. The '567 patent is directed to a stand for a mini-computer having a cut-away in the top and side portions of a back corner that does not extend through the bottom side of the stand, so that a user can reach the corresponding back bottom portion of the mini-computer through the cutaway. Ex. 1001.

8. The invention came out of a specific problem with a specific product. When Apple announced the M4 Mac mini, it placed the computer's power button on the underside of the machine, at the rear left when facing the front.

Ex. 2011 ¶ 7. Our design team addressed that problem by removing part of the back corner of the stand — the top and the side, but not the bottom — so that a finger can reach the power button without lifting the computer off the desk.

Ex. 2011 ¶ 11.

9. The Satechi product that embodies the invention is the Mac mini M4 Stand & Hub. Ex. 2011 ¶ 12 & Ex. A thereto. It launched in January 2025. Sariana sold thousands of units of that product in its first month on the market. Ex. 2011 ¶ 12. The product received four “Best of CES” awards and a “CES Picks” award at the 2025 Consumer Electronics Show. Ex. 2011 ¶ 13 & Exs. B–F thereto. Six industry publications — PetaPixel, Tom’s Guide, Engadget, MacRumors, Mashable, and XDA — published articles that identified the back-corner cutaway by name as the feature that solved the power-button problem. Ex. 2011 ¶ 14 & Exs. G–L thereto. That reception followed published skepticism that the power button’s location was a problem worth solving at all. Ex. 2011 ¶¶ 7, 12.

10. The ’567 patent covers the Mac mini M4 Stand & Hub and the related Satechi stand and hub products that use the same back-corner cutaway. The Mac mini M4 Stand & Hub is sold under SKU ST-GNMMES.

IV. SMALL-BUSINESS STATUS AND U.S. EMPLOYEES

11. Sariana is a small business. On March 13, 2026, the United States Small Business Administration approved a loan to Sariana under the SBA's 504 program, identifying the borrower as "Sariana LLC dba Satechi" at 10637 Scripps Summit Court, San Diego, California. A true and correct copy of the SBA Terms and Conditions for that loan is Exhibit 2002. The loan documents state that the loan "was made under a United States Small Business Administration (SBA) nationwide program which uses tax dollars to assist small business owners." Ex. 2002, at 9.

12. Sariana currently employs approximately 65 people worldwide, approximately 56 of whom work in the United States and approximately 9 internationally. Sariana has no manufacturing subsidiary or manufacturing affiliate anywhere in the world. Its planned expansion of manufacturing capabilities in San Diego would therefore represent a new domestic manufacturing function for the company.

13. Sariana's October 2022 California Competes Tax Credit Allocation Agreement reflects a substantial, multi-year commitment to invest in and expand its California operations. The Agreement requires Sariana to make \$12.31 million in qualifying investments through the 2026 tax year, including \$3 million in each of 2023, 2024, and 2025 and \$3.31 million in 2026.

Ex. 2004, at 8 (Ex. A). These commitments support Sariana's broader efforts to expand its operational and manufacturing capabilities in California. A true and correct copy of that Agreement, including its Exhibit A, is Exhibit 2004.

V. ONSHORE: WAREHOUSING, THEN MANUFACTURING

14. Sariana currently utilizes overseas logistics and warehousing infrastructure, including in Hong Kong. Sariana's acquisition and expansion into its larger Scripps facility in San Diego is intended, in part, to enable Sariana to bring additional warehousing, logistics, and distribution functions to the United States. The larger facility provides Sariana with the space and infrastructure necessary to expand its domestic operations and reduce its reliance on overseas logistics.

15. Sariana's San Diego staff receive finished goods, store them, and pick, pack, scan, and label orders. They perform inventory work, inspect finished goods for conformity to specification and for quantity and defects, and test products before shipment.

16. I want to be accurate about how Sariana planned its 2022 expansion. That expansion was planned around consolidating warehousing, distribution, and headquarters functions in a single building with enough electrical service to do more than warehousing. The building Sariana eventually bought is larger and more heavily powered than that consolidation use requires.

VI. THE SCRIPPS SUMMIT FACILITY

17. Sariana began looking for a larger building in 2022. We engaged a commercial real-estate broker at CBRE, Greg Hooker, and told him what we needed. I told Mr. Hooker that we needed electrical service of at least 2,000 amps, because a building with less service could not support machine tools later.

18. That search ran for several years. It produced 10547 Viper Way, on which Sariana authorized an \$11,263,000 offer on December 12, 2022, and 1695 Faraday Avenue in Carlsbad. Ex. 2008, at 1, 3; Ex. 2009, at 1; Ex. 2010, at 1, 3. Sariana bought neither. Exhibit 2008 is a true and correct copy of the CBRE marketing package for 10547 Viper Way that Mr. Hooker provided to Sariana in November 2022. Exhibit 2009 is a true and correct copy of the offer letter that Mr. Hooker sent on Sariana's behalf on December 12, 2022, with my authorization. Exhibit 2010 is a true and correct copy of the CBRE brochure for 1695 Faraday Avenue that Sariana received in connection with that search.

19. On December 30, 2025, Sariana entered into a contract to purchase 10637 Scripps Summit Court in San Diego. The purchase price was \$15,200,000. Ex. 2002, at 1–2. The building is approximately 60,334 square feet, with clear heights of about 26 to 30 feet, three dock-high doors, and

eleven grade-level doors. A true and correct copy of the seller's offering memorandum is Exhibit 2006. Before the purchase, Sariana operated from leased premises at 7365 Mission Gorge Road, Suite G, San Diego, California, of approximately 15,000 square feet, which the company had outgrown. The Scripps Summit Court building is approximately four times larger than those premises.

20. Sariana financed part of the purchase with a \$5,000,000 debenture guaranteed by the United States Small Business Administration. The SBA approved the loan on March 13, 2026. Ex. 2002, at 1. I signed the note on Sariana's behalf on May 6, 2026, and the debenture funded on June 17, 2026. A true and correct copy of the note is Exhibit 2003. The total project cost stated in the SBA's Terms and Conditions is \$15,670,000. Ex. 2002, at 2. Under the loan, Sariana must occupy at least 51 percent of the building at all times during the loan's term. Ex. 2002, at 17.

21. The purchase closed on March 23, 2026. Sariana is the record owner of the building.

22. The building's electrical service is 2,000 amps at 277/480 volts, three-phase, four-wire. The offering memorandum describes the power as "2,000a/270 - 480v 3p 4w Heavy." Ex. 2006, at 6.

23. The building's principal occupant when Sariana bought it was Dye Precision CNC, Inc., which machined aerospace parts there. Its lease expired on March 31, 2026. Before Sariana moved in, Dye Precision's general manager walked me and Mr. Guclu through the building and showed us the CNC machines and the production operation, and we discussed the building's equipment and manufacturing capability. Those machines belonged to Dye Precision and left the building when Dye Precision left. Sariana did not acquire any of them. In connection with the SBA loan, Sariana received a Phase I Environmental Site Assessment of the building prepared by Partner Engineering and Science, Inc. for the lender and dated January 26, 2026, which describes Dye Precision's onsite operations and which Sariana keeps in its business records. Exhibit 2005 is a true and correct copy of excerpts of that report.

24. Sariana took Suites A and B and was operating from Suite A by July 2026. Ex. 2007, at 1–2. Sariana's present use of the building is headquarters, warehousing, and fulfillment.

25. In July 2026, Sariana engaged a licensed electrical contractor, Summit Electrical Inc., which walked the job on July 8, 2026 and issued a budget of \$49,391 on July 21, 2026 to separate and re-meter the building's electrical distribution among its suites, including the suite occupied by the remaining

tenant. A true and correct copy of that budget is Exhibit 2007. That work re-configures distribution and metering. The 2,000-amp service that would carry machine tools was already in the building when Sariana bought it.

VII. MANUFACTURING TIMELINE AND EQUIPMENT

26. Sariana's current target is to begin initial production at the building by the end of 2028, starting with CNC machining, and to expand over time.

27. As planned, that operation would machine metal housings on CNC machines and assemble electronics in-house, while Sariana continues to source some components overseas. Final assembly and shipment would be done in the United States. The housings Sariana plans to machine include the aluminum housings used in the Mac mini stand and hub products covered by the '567 patent.

28. Sariana has evaluated CNC machine vendors and has discussed CNC equipment with its manufacturer. For example, in May 2026, JTEKT Machinery Americas Corporation, a machine-tool distributor in Arlington Heights, Illinois, sent me its current inventory of Toyoda, WELE, and Takisawa CNC machining centers, lathes, and grinders and offered to prepare a quotation for a machine configured for Sariana's application. Exhibit 2013 is a true and correct copy of that email and its attachment. In September 2026, Sariana requested quotations for CNC machines for the building, similar in kind to the

machines that Dye Precision operated there, from multiple vendors, and it expects to receive those quotations within one to two weeks.

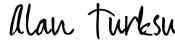
VIII. DOMESTIC DESIGN AND PROTOTYPING

29. The product covered by the '567 patent was designed in San Diego. Sariana's product-development team physically prototyped it in San Diego on 3D printers that Sariana owns and that it bought before moving into the Scripps Summit Court building.

30. No '567 product is manufactured in the United States today. The aluminum and CNC-machined samples of the product covered by the '567 patent were made in China, and the mass production of the commercial product is currently done in China. What we are investing in now is future U.S. manufacturing operations.

31. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I further understand that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001.

Dated: September 8, 2026

Signed by:

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 Alan Turksu
 Chief Executive Officer, Sariana LLC