

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

STRAUMANN USA, LLC,
Petitioner,

v.

SMART DENTURE CONVERSIONS, LLC,
Patent Owner.

PGR2026-00070
Patent 12,551,319

DECLARATION OF JUSTIN JAY (“JJ”) KOFFORD

October 12, 2026

I, Justin Jay (“JJ”) Kofford, hereby declare:

1. I am over 18 years of age and am fully competent to give this declaration based on my personal knowledge and recollection of the matters stated herein. All statements made herein of my own knowledge are true and all statements made on information and belief are true.

2. I am Chief Executive Officer of Smart Denture Conversions, LLC (“SDC”), which does business as Smart On X. SDC is the patent owner in PGR2026-00070. I submit this declaration in support of SDC’s Request for Discretionary Denial and Supporting Brief.

3. SDC is a small, family-run company in Apex, North Carolina that manufactures and sells, among other things, a system and components for dental professionals to convert removable dentures into fixed prostheses.

4. As of today, SDC has 10 full-time employees and 2 part-time employees.

5. All of SDC’s products are manufactured in the United States. That includes SDC’s Omnibut™, RapidArches™, Rapid Set Pickup Acrylic, SimpleTemp™, and Smart Denture Conversions® products.

6. Straumann launched its NeoConvert system in the United States under its Neodent™ brand in the first quarter of 2024.

7. Neodent's public website (<https://ifu.neodent.com.br>) offers an Instructions For Use ("IFU") document for the NeoConvert products, with internal number 707715.03. This document is available at <https://ifu.neodent.com.br/Neodent/BR/NEO?keycode=7899878064183>. The second page of IFU 707715.03 lists Straumann's reference numbers for products used in its NeoConvert system¹ and identifies the manufacturer² as JJGC Indústria e Comércio de Materiais Dentários S.A., Avenida Juscelino Kubitschek de Oliveira, 3.291, Cidade Industrial, 81.270-200, Curitiba, Paraná, Brasil.

8. On March 21, 2025, Straumann USA, LLC served interrogatory responses in *Smart Denture Conversions, LLC v. Straumann USA, LLC*, No. 1:24-cv-000507-JCB (D. Del.), stating:

a. "To the best of Straumann's knowledge, the three individuals primarily responsible for accused 'NeoConvert' product's manufacture and testing

¹ These include 118.408, 118.409, 116.300, 104.074, 103.676, 103.677, 103.678, 103.679, 125.206, 125.207, 116.269, 101.020, 123.008, 106.268, 104.060, and 116.301.

² Pages 12 and 126 of IFU 707715.03 explain that the symbol  denotes "Manufacturer."

are employees of JJGC Indústria e Comércio de Materiais Dentários S.A. (d/b/a Neodent).”

b. “The Accused Products are not made in the U.S. or exported from the U.S. to any other countries.”

c. “To the best of Straumann’s knowledge, the Accused Products have been manufactured and tested in Curitiba, Brazil.”

d. “To the best of Straumann’s knowledge, the manufacturer of the Accused Products is JJGC Indústria e Comércio de Materiais Dentários S.A. (d/b/a Neodent).”

9. Based on the above, it is my understanding that Straumann manufactures its NeoConvert products in Brazil and imports them into the United States for sale.

I declare under penalty of perjury that the foregoing is true and correct. These statements are made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. § 1001.

Executed on October 12, 2026 at Apex, North Carolina.



Justin Jay (“JJ”) Kofford