

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AROMA360, LLC,

Petitioner,

v.

AIR ESSSENTIALS, INC.,

Patent Owner.

Case IPR 2025-00705
U.S. Patent No. 9,527,094

**PATENT OWNER'S SUPPLEMENTAL EVIDENCE IN RESPONSE
TO PETITIONER'S OBJECTION TO EVIDENCE**

Air Essentials - Exhibit 2015
Aroma 360 v. Air Essentials
IPR No. 2025-00705

In response to Aroma360, LLC (“Petitioner”) filing its Objection to Evidence, wherein Petitioner objected to Exhibit 2002 under FRE 702, Air Essentials, Inc. (“Patent Owner”) hereby submits its Supplemental Evidence in Response to Petitioner’s Objection to Evidence (“Supplemental Evidence”), which includes Declaration of Dr. Gerald J. Micklow, Ph.D., attached hereto as Exhibit A. The service of this Supplemental Evidence is timely, as Patent Owner has served same on Petitioner within ten business days of service of Petitioner’s Objection to Evidence. 37 CFR § 42.64(b)(2).

Dated: April 15, 2026

Respectfully submitted,

/Tyler J. Litwak/

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Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Patent Owner’s Supplemental Evidence in Response to Petitioner’s Objection to Evidence (“Supplemental Evidence”) has been served in its entirety on April 15, 2026, by causing the Supplemental Evidence and accompany documents (if any) to be electronically mailed to the following attorneys of record for the Petitioner:

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DECLARATION OF DR. GERALD J. MICKLOW, Ph.D.

I. DECLARATION

I, Dr. Gerald J. Micklow, declare as follows:

1. I have been retained as an expert witness on behalf of Patent Owner in the above-captioned *inter partes* review.

2. I previously submitted a declaration in this proceeding. I submit this declaration solely to clarify the scope of my prior opinions and the basis on which those opinions were offered.

3. My assignment in this matter was limited. I was asked to review and respond to the opinions offered by Dr. Christopher White and to identify issues in Dr. White's analysis. I was not asked to provide an independent, free-standing claim construction analysis of the challenged claims.

4. In preparing my prior declaration, my opinions were directed to the analysis set forth in Dr. White's declaration. Dr. White expressly stated that, for purposes of his declaration, he was assuming Patent Owner's proposed claim constructions and the parties' stipulated claim constructions, including the constructions identified in his claim-construction section.

5. My prior declaration was not intended to offer any claim construction materially different from the claim construction positions identified and applied by Dr. White for purposes of his analysis. Rather, my opinions were directed to

explaining why, even taking Dr. White's analysis as presented, I disagreed with his technical conclusions and with the manner in which he applied the prior art to the challenged claims.

6. During my deposition, I was asked whether I independently recalled reviewing or separately applying the parties' agreed or proposed claim constructions. To the extent any of my deposition testimony suggested that I was offering an independent claim construction analysis based on my own separate understanding of the claim terms, that was not my intent.

7. To clarify, I was not offering separate claim construction opinions in my prior declaration. My opinions were directed to critiquing Dr. White's opinions and analysis, which were themselves expressly presented under the claim construction positions identified in his declaration.

8. This declaration is submitted solely to clarify the limited scope of my prior testimony. I am not offering any new substantive opinions, new invalidity analysis, or new claim-by-claim analysis beyond the opinions already set forth in my prior declaration.

II. OATH

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 15, 2026

By:



Gerald Micklow, Ph.D.