

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

GUANGZHO EKO TRADING DEVELOPMENT CO., LTD.,
Petitioner,
v.
NONE STARS GROUP (U.S.A.) Inc.,
Patent Owner.

Case No. IPR2025-01191
U.S. Patent No. 10,822,165 B2

**PETITIONER'S OBJECTIONS TO
PATENT OWNER'S RESPONSE EVIDENCE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioners hereby object to the exhibits cited and relied upon in Patent Owner's April 8, 2026 response on the following grounds. For each objected to exhibit, the pertinent Federal Rule of Evidence ("FRE") or other rule that gives rise to the objection is provided, along with a brief summary of the basis of the objection.

1. Ex. 2002 – Declaration of Xin Wang: FRE 401, 402. The exhibit is not relevant to any of the issues in this proceeding. Patent Owner appears to rely on the exhibit in an effort to show and in support of its allegation that the prior art at issue is purportedly non-enabled. But inventor testimony has no bearing on whether a prior art reference is (or is not) enabled.

2. Ex. 2003 – Declaration of Jiangqun Chen: FRE 401, 402. The exhibit is not relevant to any of the issues in this proceeding. Patent Owner appears to rely on the exhibit in an effort to show and in support of its allegation that the prior art at issue is purportedly non-enabled. But inventor testimony has no bearing on whether a prior art reference is (or is not) enabled.

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: April 15, 2026

/K. Patrick Herman/

K. Patrick Herman, Reg. No. 75,018
Orrick, Herrington & Sutcliffe LLP
51 West 52nd Street
New York, NY 10019
Telephone: (212) 506-3596
Email: P52PTABDocket@orrick.com

Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on April 15, 2026 via email upon the following counsel of record for Patent

Owner:

Raymond Y. Chan
Patricia Ray
DAVID & RAYMOND PATENT FIRM
raymond@davidandraymond.com
raypatricia@yahoo.com

/K. Patrick Herman/

K. Patrick Herman, Reg. No. 75,018
Orrick, Herrington & Sutcliffe LLP
51 West 52nd Street
New York, NY 10019
Telephone: (212) 506-3596
Email: P52PTABDocket@orrick.com