

Filed: October 29, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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FRESH PRODUCTS, LLC

Petitioner

v.

SANASTAR, INC., d/b/a WIZKID PRODUCTS

Patent Owner

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IPR2025-01339

Patent 10,036,154

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**DECLARATION OF EDWARD A. SCHLATTER  
IN SUPPORT OF PETITIONER'S OPPOSITION TO  
PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL**

*Fresh Products, LLC v. Sanastar, Inc.*

IPR2025-01339

**Fresh Products Exhibit 1032**

## **DECLARATION OF EDWARD A. SCHLATTER**

I, Ed Schlatter, declare and state as follows:

1. The following statements are based on my personal knowledge.
2. I am a retired partner in the law firm of Knobbe, Martens, Olson & Bear, LLP, counsel for Fresh Products, Inc. (“Fresh Products”).
3. On October 23, 2023, Fresh Products received a cease-and-desist letter from Sanastar, Inc. (“Sanastar”). Ex. 2004.
4. Between October 23, 2023, and June 24, 2024, I engaged, on behalf of Fresh Products, in a series of written communications with Sanastar’s counsel.
5. On June 24, 2024, I sent a letter to Sanastar, in which I identified Fushimi (Ex. 1024) to Sanastar and notified Sanastar of Fresh Products’ intention to seek *inter partes* review of the ’154 patent and ’649 patent if the parties were unable to resolve their dispute outside of litigation. A true and correct copy of my letter is marked as Ex. 1026.
6. I never received a response from Sanastar to the letter I sent on June 24, 2024.
7. I declare that all statements made herein of my own knowledge are true and that any statements made on information and belief are believed to be true. I declare 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: October 29, 2025

/Edward A. Schlatter/

Edward A. Schlatter