

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOP GLORY TRADING GROUP INC. AND
DP DREAM PAIRS, INC.,
Petitioners,

v.

COLE HAAN LLC,
Patent Owner.

Case No. IPR2025-01392
Patent 10,327,511

Case No. IPR2025-01393
Patent 10,443,163

Case No. IPR2025-01394
Patent 11,041,262

Case No. IPR2025-01395
Patent D768,969

DECLARATION OF THOMAS LINKO

I, Thomas Linko, declare as follows:

1. I am the Chief Financial Officer of Patent Owner Cole Haan LLC. I have personal knowledge of the facts stated herein, or I am informed and believe of their truth and accuracy, and if called as a witness, could and would testify competently to such facts under oath.

2. Since at least May 2015, Cole Haan has marked packaging containing its shoes with the following statement containing a link to Cole Haan's Patents webpage: "May be patented. Pat. Colehaan.com/Patents.html." One example of this marking is shown in Appendix A.

3. U.S. Patent No. 10,327,511 has been continuously listed on Cole Haan's Patents webpage since August 2019, as associated with Cole Haan's Stitchlite shoes.

4. U.S. Patent No. 10,443,163 has been continuously listed on Cole Haan's Patents webpage since December 2019, as associated with Cole Haan's Stitchlite shoes.

5. U.S. Patent No. 11,041,262 has been continuously listed on Cole Haan's intellectual property webpage since October 2021, as associated with Cole Haan's Stitchlite shoes.

6. Cole Haan's Stitchlite shoes were launched on July 26, 2016, and since then, Cole Haan continues to release new Stitchlite shoes. Examples of these shoes are available on Cole Haan's website at <https://www.colehaan.com/mens-stitchlite> and <https://www.colehaan.com/womens-stitchlite>.

7. Since July 26, 2016, Cole Haan has sold over 4.5 million Stitchlite shoes in the United States that include the features claimed in U.S. Patent No. 10,327,511, U.S. Patent No. 10,443,163, and U.S. Patent No. 11,041,262, including "wingtip pattern," "line of broguing," "jersey stitch knit," and/or "pointelle stitch knit."

8. U.S. Patent No. D768,969 has been continuously listed on Cole Haan's Patents webpage since December 2016, as associated with the OriginalGrand midsole.

9. Since November 2015, Cole Haan has launched several shoes with the midsole design claimed in U.S. Patent No. D768,969. Examples of these shoes

include the Men's OG Sport Perforated Trainer, the Men's OriginalGrand Sport Perforated Sneaker, the Men's OriginalGrand Perforated Sneaker, and the Women's OriginalGrand Perforated Sneaker. Images of these shoes are attached at Appendix B. To date, Cole Haan has sold over 35,000 of these shoes in the United States.

10. In October 2022, Cole Haan entered into a Settlement Agreement with American Strap, Inc. d/b/a Martin Dingman related to, among other things, alleged infringement of U.S. Patent No. 10,327,511 and U.S. Patent No. 10,443,163. The terms of the Settlement Agreement are confidential.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 12, 2025.



Thomas Linko
Chief Financial Officer
Patent Owner Cole Haan LLC

Appendix A

COLE HAAN



Name **OG GRD STCHLT WNG OX**

Color **SAFARI/VINTAGE IND**

Size **9 M**

No. **C31075**

8 **42** **26.5**
UK EUR CM



May be patented. Pat. Colehaan.com/Patents.html

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Appendix B



Men's OG Sport Perforated Trainers



Men's OriginalGrand Sport Perforated Sneakers



Men's OriginalGrand Perforated Sneaker



Women's OriginalGrand Perforated Sneaker