

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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BONERGE LIFESCIENCE (HUNAN) CO., LTD.,  
Petitioner

v.

NANJING NUTRABUILDING BIO-TECH CO., LTD.,  
Patent Owner

U.S. Patent No. 10,278,961  
Filing Date: April 19, 2017  
Issue Date: May 7, 2019  
Title: Administration of berberine metabolites

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*Inter Partes* Review No.: IPR2025-01593

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**DECLARATION OF HUA CHEN**

I, Hua Chen, declare:

1. I am over 21 years of age and competent to make this declaration. I make this declaration based on my own personal knowledge.

2. I am an attorney at ScienBiziP, P.C., and I am counsel of record for Petitioner Bonerge Lifescience (Hunan) Co., Ltd. (“Petitioner” or “Bonerger”) in *Nanjing Nutrabuilding Bio-Tech Co., Ltd. v. Bonerge Lifescience (Hunan) Co., Ltd.*, Case No. 5:25-cv-00271-JGB-SP (the “Parallel Litigation”), currently pending in the United States District Court for the Central District of California.

3. In the Parallel Litigation, no party or expert depositions have been noticed.

4. In the Parallel Litigation, no case-dispositive motions have been filed, and the deadline for case dispositive motion hearings is February 22, 2027.

5. In the Parallel Litigation, Plaintiff has served only one initial set of written discoveries to Defendant Bonerge Lifescience (Hunan) Co., Ltd., which was answered.

6. In the Parallel Litigation, the parties combined have produced slightly over three thousand pages and covering only a few hundred documents.

7. In the Parallel Litigation, the parties have yet to prepare any claim construction briefs, which are not due until March 12, 2026.

8. In the Parallel Litigation, the claim construction hearing is currently scheduled for April 21, 2026 (or as soon thereafter as possible).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 30, 2025, in Los Angeles.

/S/ Hua Chen

Hua Chen