

IPR2025-01593  
Patent 10,278,961

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.

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Patent 10,278,961

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Before KAREN I. SWEENEY, *Trial Paralegal*

**DECLARATION OF MARK D. NIELSEN**

**DECLARATION**

I, Mark D. Nielsen, 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 Scheef & Stone, LLP, and I am counsel of record for Patent Owner Nanjing Nutrabuilding Bio-Tech Co., Ltd. (“Patent Owner” or “NNB”) 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. On September 22, 2025, in the Parallel Litigation, NNB served its Preliminary Infringement Contentions and associated document disclosure of over 1,500 pages.

4. To date in the Parallel Litigation, NNB has produced over 2,000 pages of documents, and Defendant/Petitioner Bonerge Lifescience (Hunan) Co., Ltd. (“Defendant” or “Petitioner”) has produced over 1,200 pages of documents.

5. On November 4, 2025, in the Parallel Litigation, Defendant/Petitioner served its Preliminary Invalidity Contentions, which consisted of a 115 page primary document, the associated document disclosure of approximately 717 pages.

6. On November 18, 2025, in the Parallel Litigation, NNB and

Defendant/Petitioner met the deadline for an exchange of a list of terms for possible claim construction.

7. On December 3, 2025, in the Parallel Litigation, NNB and Defendant/Petitioner have, or will have, exchanged proposed constructions for the claim terms on the parties' respective lists, as well as support for the proposed claim terms for construction.

8. In the Parallel Litigation, NNB has propounded a detailed first set of discovery, including Interrogatories, Requests for Production of Documents, and Requests for Admissions to Defendant/Petitioner. Counsel for the parties in the Parallel Litigation have met and conferred twice on the responses and Defendant/Petitioner has provided supplemental responses and additional documents in response to the meet and confer.

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

Executed on December 1, 2025, in Frisco, Texas.

/s/ Mark D. Nielsen  
Mark D. Nielsen