

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

PRONG, INC.  
Petitioner

v.

YEOSHUA SORIAS  
Patent Owner

*Inter Partes Review*

*Case No. IPR2015-01317*

*U.S. Patent No. 8,712,486*

AFFIDAVIT OF Redacted

Redacted, being duly sworn, deposes and says:

1. I am the President of Redacted Redacted Redacted is a manufacturer, designer, and reseller of batteries and mobile electronic accessories that contain batteries, including cellular phone cases with a built-in battery. Redacted

Redacted

2. I am submitting this affidavit at the request of Yeoshua Sorias and Zilicon Accessories, LLC ("Zilicon") for use in a pending *Inter Partes* Review which I understand to involve Mr. Sorias' patent, U.S. Patent No. 8,712,486 (the "486 Patent"). I am not a party to the *Inter Partes* Review. I am familiar with the facts and events detailed herein, and I make these statements from my personal knowledge.

3. Redacted provides design and/or manufacturing services for numerous well-known third-party companies in the portable power space, including Redacted Redacted Redacted is the exclusive manufacturer of cellular phone battery cases marketed by Redacted Redacted is also the licensing partner for Redacted products, which it manufactures and distributes. Redacted products are distributed in Redacted

4. Redacted also serves as an OEM materials supplier to technology and electronics companies including Redacted


Redacted

5. As a global leader in the portable power industry, Redacted's design and manufacturing services are in high demand. Redacted often operates at or close to its manufacturing capacity, and is highly selective regarding new products it chooses to fabricate.
6. Redacted has entered into agreements to be the appointed manufacturer for Zilicon's "Squirrel" brand cellular phone battery-charging cases that incorporate the innovative technology described in the "486 Patent". My understanding is that Zilicon has exclusive manufacturing and distribution rights under the "486 Patent". Redacted entered into an initial Manufacturing and Supply Agreement in May of 2015 with Redacted, who I understand was acting in conjunction with Zilicon. In October of 2015, Redacted entered into a subsequent Manufacturing and Supply Agreement directly with Zilicon.
7. In addition to the manufacturing relationship, Redacted has entered into a brand-building campaign and distribution partnership with Zilicon to distribute and sell Squirrel-branded products in the APAC region. Redacted has committed to an initial purchase order of 22,000 units of the Squirrel Power Case for iPhone 6/6s intended for commercialization in Japan, China, Hong Kong, and Singapore.
8. The patented cellular phone battery case market is becoming increasingly commoditized, but Redacted believes that the unique technology embodied in the Squirrel case—namely, the integration of a charger and A/C prongs that fold flat against a relatively thin cell-phone case that can remain securely connected to the phone while the phone is being operated (the "Squirrel Features")—will distinguish this product from other cellular phone battery cases that still require a separate charger to be used.
9. The presence of the Squirrel Features in a battery case, and the expectation that because of these features the Squirrel case will be a successful disruptor in the power bank market, is the primary reason that Redacted decided to partner with Zilicon to manufacture the Squirrel case and also the primary reason that Redacted has committed to purchase 22,000 units for sale in the APAC region.

I attest under penalty of perjury that the foregoing is true to the best of my knowledge, information, or belief.

# Redacted

Sworn to before me this 17<sup>th</sup> day of  
March, 2016

  
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Notary Public

DAVID HASCUP  
Notary Public, Redacted  
My Commission Expires January 19, 2017