

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

GENOMIC PREDICTION, INC.,

Plaintiff,

vs.

NATHAN TREFF, TALIA METZGAR and
NUCLEUS GENOMICS, INC.,

Defendants.

Case No. 2:25-cv-16850-SDW-AME

District Judge Susan D. Wigenton

Magistrate Judge Andre M. Espinosa

Motion Date: November 4, 2025

**DECLARATION OF JIA XU IN SUPPORT OF PLAINTIFF’S APPLICATION FOR
PRELIMINARY INJUNCTION WITH TEMPORARY RESTRAINING ORDER AND
LIMITED EXPEDITED DISCOVERY**

Jia Xu, PhD, of full age, hereby certifies:

1. I am the Chief Technology Officer for Genomic Prediction, Inc. (“GP”), the Plaintiff in this litigation. I have worked at GP since 2019.

2. I have a PhD in Bioinformatics from Boston University and I have been working in the genomics and bioinformatics industry for 13 years.

3. I make this Declaration in support of GP’s application for a preliminary injunction with a temporary restraining order and limited expedited discovery. This Declaration is based upon personal knowledge and my review of the business records maintained by GP.

4. I am aware that defendant Nucleus Genomics, Inc. claims in opposition to the application that it does not compete with GP because it has no “wet laboratory” capabilities.


5. Nucleus does not necessarily need to maintain in-house wet lab capabilities to compete with GP. From a patient’s standpoint, those seeking PGT-P results are primarily interested in the outcome rather than how or where the testing is performed.

6. Once Nucleus validates its new workflow with Treff's guidance, even if it does not develop its own wet lab, it could simply direct patients to a third-party provider, capturing cases that would otherwise come to GP.

7. Treff's knowledge and use of GP trade secrets would facilitate Nucleus's validation process, even with a third-party provider, and Nucleus would in that fashion be using GP trade secrets to compete with GP.

I declare under the penalty of perjury under the laws of the United States and New Jersey that the foregoing is true and correct to the best of my knowledge.

Dated: November 3, 2025


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Jia Xu