

Michael Vincent

From: Michael Vincent
Sent: Wednesday, July 9, 2025 9:46 AM
To: sfareed@mwe.com; akapadia@mwe.com; Oaks, Brian; ddacus@dacusfirm.com; kmeek@mwe.com; Andrea Fair; Ashley Hodson; Regina Williamson; Song, Ethan; Stratasys-MWE
Cc: FR Service-Bambu Lab/Stratasys
Subject: RE: [Bambu] 464 IPR Stipulation

Counsel,

Shenzhen Tuozhu Technology Co., Ltd. filed a petition for IPR against claims of U.S. Patent No. 11,167,464 (the “464 Patent”) and that proceeding has been assigned AIA Review No. IPR2025-00585. If IPR is instituted in IPR2025-00585, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Shenzhen Tuozhu and the other defendants named in the related District Court Case No. 2:24-cv-00645 (E.D. Tex.) and declaratory judgment plaintiffs in the related District Court Case No. 2:25-cv-00465 (E.D. Tex.) stipulate that they will not pursue in the 2:24-cv-00645 case or the 2:25-cv-00465 case, against the ‘464 Patent, (i) the specific grounds asserted in IPR2025-00585, (ii) any other ground that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications), (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2025-00585, or (iv) any ground that could be raised under §§ 102 or 103 on the basis of system art corresponding to the references that form the basis of any ground raised in IPR2025-00585.

Best regards,
Michael

From: Michael Vincent <vincent@fr.com>
Sent: Tuesday, April 8, 2025 4:47 PM
To: sfareed@mwe.com; akapadia@mwe.com; Oaks, Brian <Boaks@mwe.com>; ddacus@dacusfirm.com; kmeek@mwe.com; Andrea Fair <andrea@millerfairhenry.com>; Ashley Hodson <ashley@millerfairhenry.com>; Regina Williamson <gina@millerfairhenry.com>; Song, Ethan <esong@mwe.com>; Stratasys-MWE <Stratasys-MWE@mwe.com>
Cc: FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>
Subject: RE: [Bambu] 464 IPR Stipulation

Counsel,

Shenzhen Tuozhu Technology Co., Ltd. filed a petition for IPR against claims of U.S. Patent No. 11,167,464 (the “464 Patent”) and that proceeding has been assigned AIA Review No. IPR2025-00585. If IPR is instituted in IPR2025-00585, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Shenzhen Tuozhu and the other defendants named in the related District Court Cases No. 2:24-cv-00645 (E.D. Tex.) and 1:24-cv-01511 (W.D. Tex.) stipulate that they will not pursue in the 2:24-cv-00645 case or the 1:24-cv-01511 case, against the ‘464 Patent, the specific grounds asserted in IPR2025-00585 or any other ground that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications).

Best regards,
Michael

From: Michael Vincent <vincent@fr.com>

Sent: Thursday, February 6, 2025 10:34 AM

To: sfareed@mwe.com; akapadia@mwe.com; Oaks, Brian <Boaks@mwe.com>; ddacus@dacusfirm.com; kmeek@mwe.com; Andrea Fair <andrea@millerfairhenry.com>; Ashley Hodson <ashley@millerfairhenry.com>; Regina Williamson <gina@millerfairhenry.com>; Song, Ethan <esong@mwe.com>; Stratasys-MWE <Stratasys-MWE@mwe.com>

Cc: FR Service-Bambu Lab/Stratasys <FRServiceBambuLabStratasys@fr.com>

Subject: [Bambu] 464 IPR Stipulation

Counsel,

Shenzhen Tuozhu Technology Co., Ltd. is filing a petition for IPR challenging claims of U.S. Patent No. 11,167,464 (the "464 Patent"). If IPR is instituted based on this petition, Shenzhen Tuozhu and the other defendants named in the related District Court Case No. 2:24-cv-00645 (E.D. Tex.) stipulate that, while such IPR is pending, they will not pursue in the 2:24-cv-00645 case, against the '464 Patent, the same grounds of invalidity raised in this petition.

Best regards,
Michael

Michael Vincent

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