

## Michael Vincent

---

**From:** Michael Vincent  
**Sent:** Wednesday, July 9, 2025 9:46 AM  
**To:** Aaron Pirouznia; 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; Michael Hawkins  
**Subject:** RE: [Bambu] 774 IPR Stipulation

Counsel,

Shenzhen Tuozhu Technology Co., Ltd. filed a petition for IPR against claims of U.S. Patent No. 11,886,774 (the “774 Patent”) and that proceeding has been assigned AIA Review No. IPR2025-00611. If IPR is instituted in IPR2025-00611, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Shenzhen Tuozhu and the other defendants named in the related District Court Case No. 2:24-cv-00645 (E.D. Tex.)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 ’774 Patent, (i) the specific grounds asserted in IPR2025-00611, (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), or (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 IPR2025-00611.

Best regards,  
Michael

---

**From:** Michael Vincent <vincent@fr.com>  
**Sent:** Tuesday, April 8, 2025 4:47 PM  
**To:** Aaron Pirouznia <pirouznia@fr.com>; 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>; Michael Hawkins <hawkins@fr.com>  
**Subject:** RE: [Bambu] 774 IPR Stipulation

Counsel,

Shenzhen Tuozhu Technology Co., Ltd. filed a petition for IPR against claims of U.S. Patent No. 11,886,774 (the “774 Patent”) and that proceeding has been assigned AIA Review No. IPR2025-00611. If IPR is instituted in IPR2025-00611, unless institution is later vacated, reversed or otherwise withdrawn by rehearing or Director Review, Shenzhen Tuozhu and the other defendants named in the related District Court Cases No. 2:24-cv-00645 (E.D. Tex.)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 ’774 Patent, the specific grounds asserted in IPR2025-00611 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:** Aaron Pirouznia <[pirouznia@fr.com](mailto:pirouznia@fr.com)>

**Sent:** Friday, February 14, 2025 9:24 AM

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

**Cc:** FR Service-Bambu Lab/Stratasys <[FRServiceBambuLabStratasys@fr.com](mailto:FRServiceBambuLabStratasys@fr.com)>; Michael Hawkins <[hawkins@fr.com](mailto:hawkins@fr.com)>; Michael Vincent <[vincent@fr.com](mailto:vincent@fr.com)>

**Subject:** [Bambu] 774 IPR Stipulation

Counsel,

Shenzhen Tuozhu Technology Co., Ltd. is filing a petition for IPR challenging claims of U.S. Patent No. 11,886,774 (the “774 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 ’774 Patent, the same grounds of invalidity raised in this petition.

Best regards,  
Aaron

**Aaron P. Pirouznia**

Principal ■ Fish & Richardson P.C.

T: 214 292 4073

[pirouznia@fr.com](mailto:pirouznia@fr.com) | [Bio](#) | [LinkedIn](#) | [fr.com](#)

1717 Main Street, Suite 5000, Dallas, TX 75201