



Re: HFT v. Champion

From Eric Huang <erichuang@quinnemanuel.com>

Date Wed 9/3/2025 5:29 PM

To Tim Ziolkowski <tjz@zpatents.com>; Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>

Cc Jacob Fritz <jmf@zpatents.com>; HB - Champion <HB-Champion@huschblackwell.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>

All,

Following up on our call yesterday, we are hoping to jointly move the Court for leave to expand the word limits for the claim construction briefs. We propose 8500 words. Let us know whether Champion is agreeable. We can prepare the joint motion and get it on file tonight.

Also, we discussed dates for remote depositions of our respective experts. Champion offered its expert for deposition on Sep 11. HFT offered its expert for deposition on Sep 12. We agreed to limit the depositions to 4 hours on the record. We tabled discussion of start time for later.

In addition, Jennifer suggested yesterday jointly informing the Court that we will not bring our respective expert declarants to the hearing in person. I believe she proposed proceeding with declarations and deposition and foregoing cross-examination at the hearing. She suggested alerting the Court in our Joint Claim Construction Statement. I raised the concern that if the Court is expecting to hear cross examination, we may want to give the Court more notice to be able to get feedback from the Court earlier so we can prepare. Jennifer suggested moving up the Joint Claim Construction Statement to September 18. I suggested perhaps alerting the court earlier either in joint call with the courtroom deputy or as part of the joint request on the page limits. I also suggested that we could offer as an alternative remote examination of the parties' experts. HFT is amenable to a joint request suggesting either foregoing cross-examination or proceeding with examination remotely as a cost saving measure. Let us know if you agree.

Finally, as I suggested yesterday, the parties appear to be close or even agree on construction of "communicate" and "pressure regulator." Let us know if Champion will agree with HFT's phrasing as it is simpler and remains true to the specification without introducing new words or concepts and without changing the substance of what Champion has proposed as alternatives.

Thank you.

Eric

eric huang | **quinn emanuel urquhart & sullivan, llp**

Tel: (212) 849-7143 | email: erichuang@quinnemanuel.com

From: Tim Ziolkowski <tjz@zpatents.com>

Sent: Monday, September 1, 2025 4:41 PM

To: Eric Huang <erichuang@quinnemanuel.com>; Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>

Champion - EX2118, Page 1 of 5

Harbor Freight Tools USA Inc. et al v. Champion Power Equip., Inc. 1/5

IPR2025-00805

Cc: Jacob Fritz <jmf@zpatents.com>; HB - Champion <HB-Champion@huschblackwell.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>

Subject: Re: HFT v. Champion

[EXTERNAL EMAIL from tjz@zpatents.com]

Eric, I can do the latter slot if that works for Jen.

Thanks,
Tim

From: Eric Huang <erichuang@quinnemanuel.com>

Sent: Monday, September 1, 2025 11:45:43 AM

To: Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>

Cc: Tim Ziolkowski <tjz@zpatents.com>; Jacob Fritz <jmf@zpatents.com>; HB - Champion <HB-Champion@huschblackwell.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>

Subject: Re: HFT v. Champion

Jennifer, Tim,

I apologize for mixing up the messages on Friday. And I apologize for an email on Labor Day. No need to respond today but wanted to float a couple of time slots for a call tomorrow. Are you both available at any of the following times?

Bet. 11a - 2p ET
after 330p ET

I can circulate an invite once we settle on a time.

Thank you.

Eric

eric huang | **quinn emanuel urquhart & sullivan, llp**

Tel: (212) 849-7143 | email: erichuang@quinnemanuel.com

From: Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>

Sent: Friday, August 29, 2025 2:00 PM

To: Eric Huang <erichuang@quinnemanuel.com>

Cc: Tim Ziolkowski <tjz@zpatents.com>; Jacob Fritz <jmf@zpatents.com>; HB - Champion <HB-Champion@huschblackwell.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>

Subject: Re: HFT v. Champion

[EXTERNAL EMAIL from jennifer.hoekel@huschblackwell.com]

Tuesday will have to do. Thanks.

Sent from my iPad

On Aug 29, 2025, at 12:57 PM, Eric Huang <erichuang@quinnemanuel.com> wrote:

[EXTERNAL EMAIL]

Sorry just saw your later email. I can talk Monday.

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From: Eric Huang <erichuang@quinnemanuel.com>
Sent: Friday, August 29, 2025 1:56:52 PM
To: Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>; Tim Ziolkowski <tjz@zpatents.com>; Jacob Fritz <jmf@zpatents.com>
Cc: HB - Champion <HB-Champion@huschblackwell.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>
Subject: Re: HFT v. Champion

3 CT works. Will send a link.

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From: Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>
Sent: Friday, August 29, 2025 11:20:30 AM
To: Eric Huang <erichuang@quinnemanuel.com>; Tim Ziolkowski <tjz@zpatents.com>; Jacob Fritz <jmf@zpatents.com>
Cc: HB - Champion <HB-Champion@huschblackwell.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>
Subject: RE: HFT v. Champion

[EXTERNAL EMAIL from jennifer.hoekel@huschblackwell.com]

We can be available at 3. Will that work?

Jennifer Hoekel [<image001.png>](#)

(she/her/hers)

Partner

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Jennifer.Hoekel@huschblackwell.com

From: Eric Huang <erichuang@quinnemanuel.com>
Sent: Thursday, August 28, 2025 10:32 PM
To: Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>; Tim Ziolkowski <tjz@zpatents.com>; Jacob Fritz <jmf@zpatents.com>
Cc: HB - Champion <HB-Champion@huschblackwell.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>
Subject: Re: HFT v. Champion

Jennifer

Do you have time tomorrow after 1130 CT to touch base on some of the other logistics for the briefing and hearing?

Eric

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From: Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>
Sent: Wednesday, August 27, 2025 4:54:20 PM
To: Eric Huang <erichuang@quinnemanuel.com>; Tim Ziolkowski <tjz@zpatents.com>; Jacob Fritz <jmf@zpatents.com>
Cc: HB - Champion <HB-Champion@huschblackwell.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>
Subject: RE: HFT v. Champion

[EXTERNAL EMAIL from jennifer.hoekel@huschblackwell.com]

Eric:

Responding to the below, Champion is withdrawing the three terms that it previously added to the list for construction (gaseous fuel, liquid fuel and fuel source) and is agreeable to your proposed order of presentation.

Please let me know if you have any questions.

Jennifer

Jennifer Hoekel <[image001.png](#)>

(she/her/hers)

Partner

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Jennifer.Hoekel@huschblackwell.com

From: Eric Huang <erichuang@quinnemanuel.com>
Sent: Thursday, August 14, 2025 8:46 PM
To: Tim Ziolkowski <tjz@zpatents.com>; Jacob Fritz <jmf@zpatents.com>
Cc: HB - Champion <hb-champion@huschblackwell.com>; QE-HarborFreight-Champion <qe-harborfreight-champion@quinnemanuel.com>
Subject: HFT v. Champion

Counsel,

Following up on our meet and confer regarding claim construction and in an effort to narrow the disputes for the Court, Harbor Freight proposes to present the following claim terms to the Court for construction/decision. Furthermore, in the interests of assisting the Court with review of the briefs, we propose that the parties agree to present the disputed terms grouped and in this order in the briefing. Please let us know if Champion agrees. We are available to confer further regarding the terms.

- "selector switch" (101/667/390/896)
- "valve assembly" (101/667/390/896)
- "a mechanical fuel valve" (780/654/985/970/895)
- "fuel lockout apparatus" (780/654/895)
- "from coupling"/ "coupling"/ "to couple" (780/654/895)
- "communicate"/ "communication" (780/895)
- "switch . . . to [enable changing / change] operation of the engine between gaseous fuel and liquid fuel" (398/145/034)

Champion - EX2118, Page 4 of 5

Harbor Freight Tools USA Inc. et al v. Champion Power Equip., Inc. 4/5

IPR2025-00805

- "rotating mechanical valve" (145)
- "pressure regulator" (034/654/985/120/970)
- "integral components of" (985)
- "disconnected from the dual fuel generator" (970)
- "gaseous cutoff" (034)
- "coupled to [verb]" (034)

With respect to Jennifer's email tonight, the Court didn't enter the parties proposed schedule. As I mentioned in the last meet and confer on claim construction with Mr. Ziolkowski, we think it may make sense to file a joint submission closer to the time we file the opening briefs. The reduction of claim terms above should help smooth the presentation of claim terms to the Court. We can discuss tomorrow.

Thank you.

Eric