

1 Ramsey M. Al-Salam, Bar No. 109506  
2 RAlSalam@perkinscoie.com  
3 PERKINS COIE LLP  
4 1201 Third Avenue, Suite 4900  
5 Seattle, Washington 98101-3099  
6 Telephone: +1.206.359.8000  
7 Facsimile: +1.206.359.9000

8 Amanda Tessar, Bar No. 33173 (admitted  
9 *pro hac vice*)  
10 ATessar@perkinscoie.com  
11 PERKINS COIE LLP  
12 1900 Sixteenth Street, Suite 1400  
13 Denver, Colorado 80202-5255  
14 Telephone: +1.303.291.2357  
15 Facsimile: +1.303.291.2457

16 (Additional counsel listed on signature  
17 page)

18 *Attorneys for Plaintiff*  
19 Inari Medical, Inc.

20 Joseph R. Re (SBN 134,479)  
21 joe.re@knobbe.com  
22 Joshua J. Stowell (SBN 246,916)  
23 joshua.stowell@knobbe.com  
24 KNOBBE, MARTENS, OLSON & BEAR, LLP  
25 2040 Main Street. 14th Floor  
26 Irvine, CA. 92614  
27 (949) 760-0404 Telephone  
28 (949) 760-9502 Facsimile

Nicholas A. Belair (SBN 295,380)  
nick.belair@knobbe.com  
KNOBBE, MARTENS, OLSON & BEAR, LLP  
333 Bush St., 21st Fl.  
San Francisco CA 94104  
415-217-8399 - Telephone

*Attorneys for Defendant*  
Imperative Care, Inc.

14 **IN THE UNITED STATES DISTRICT COURT**  
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN JOSE DIVISION**

18 INARI MEDICAL, INC.,  
19 Plaintiff,  
20 v.  
21 IMPERATIVE CARE, INC.,  
22 Defendant.  
23

Civil Action No. 5:24-cv-03117-EKL-SVKx

**JOINT STIPULATION TO CONTINUE  
THE STAY OF LITIGATION PENDING  
IPR DECISIONS AND VACATE  
UPCOMING CASE MANAGEMENT  
CONFERENCE**

Hon. Eumi K. Lee

*Imperative Care v. Inari Medical*  
IPR2025-01021  
**Imperative Care Ex. 1056**

1 Plaintiff Inari Medical, Inc. (“Inari”) and Defendant Imperative Care, Inc.  
2 (“Imperative Care”) (collectively “the Parties”) hereby submit this joint stipulation to  
3 continue the stay of the litigation pending the issuance of the next IPR decision and to reset  
4 the upcoming case management conference for early May.

5 This is a patent infringement case where Inari asserts eleven patents from the three  
6 patent families against Imperative Care. On September 29, 2025, the Court issued an Order  
7 Granting in Part Imperative Care’s Motion to Stay (ECF No. 137). In that Order, the Court  
8 stayed the action in its entirety until February 4, 2026, and scheduled a further case  
9 management conference for January 28, 2026, at 1:30 p.m. via Zoom video. The Court also  
10 ordered the parties to file a joint case management statement by January 21, 2026 that (1)  
11 provides an update regarding the status of all pending IPR proceedings as to the patents  
12 asserted by Inari in this action, (2) identifies and discusses the significance of any new IPR  
13 petitions that were filed, and any institution decisions that have issued, during the pendency  
14 of the stay, and (3) addresses whether the stay should be extended or lifted.

15 Consistent with the Court’s Order, the Parties have provided an update on the status of  
16 all the pending IPR proceedings below.

17 The Parties have also met and conferred regarding the stay. Inari has proposed  
18 continuing the stay until after the Patent Trial and Appeal Board (“PTAB”) has issued a Final  
19 Written Decision in IPR2025-00156 relating to U.S. Patent No. 11,697,012. The PTAB is  
20 statutorily required to issue a Final Written Decision in that IPR by April 22, 2026.

21 While Imperative Care submits that the stay should remain in effect until after  
22 resolution of all the pending IPRs, Imperative Care does not oppose Inari’s proposal to  
23 continue the stay until after the next Final Written Decision, at which point the Parties will  
24 again update the Court regarding the status of the IPRs and address whether the stay should  
25 be extended.

26 Thus, with the Court’s permission, the Parties agree to the following:

- 27
- The case management conference scheduled for January 28, 2026 is vacated.
- 28

- 1 • A further case management conference is set for May 6, 2026 (or a date  
2 convenient for the Court).
- 3 • This action is STAYED in its entirety until the date of the next case management  
4 conference.
- 5 • The parties shall file a joint case management statement by April 29, 2026, not to  
6 exceed ten pages. In the statement, the parties shall provide an update regarding  
7 the status of all pending IPR proceedings as to the patents asserted by Inari in this  
8 action. The parties shall identify and discuss the significance of any institution  
9 decisions and final written decisions that have issued during the pendency of the  
10 stay. The parties shall also address whether the stay should be extended.

11 **UPDATE REGARDING STATUS OF PENDING IPRS**

12 Inari asserts eleven patents against Imperative Care in this lawsuit.<sup>1</sup> See Third Am.  
13 Compl., ECF No. 112. Inari also previously asserted, but withdrew, infringement claims  
14 involving a twelfth patent (U.S. Patent No. 11,697,011, the '011 Patent). See Compl., ECF  
15 No. 1; Second. Am. Compl., ECF No. 68.

16 Imperative Care has filed IPR petitions challenging the validity of all twelve patents.  
17 As shown in the table below, the PTAB has instituted eight IPRs on the '011 Patent, '012  
18 Patent, '005 Patent, '921 Patent, '291 Patent, 11-'333 Patent, '910 Patent, and '580 Patent.  
19 The PTAB has denied institution of one IPR (the '691 Patent). The Parties are awaiting  
20 institution decisions for three IPRs covering the '384 Patent, '669 Patent, and 12-'333  
21 Patent.

22 The PTAB issued a final written decision for the (withdrawn) '011 Patent on January  
23 16, 2026. In the Final Written Decision, the PTAB found all claims (Claims 1-9) of the '011  
24 Patent unpatentable.

---

26 <sup>1</sup> The asserted patents asserted include U.S. Patent Nos. 11,697,012 ('012 Patent); 11,744,691  
27 ('691 Patent); 11,554,005 ('005 Patent); 11,844,921 ('921 Patent); 11,865,291 ('291 Patent);  
28 11,969,333 (11-'333 Patent); 11,974,910 ('910 Patent); 12,016,580 ('580 Patent); 12,109,384  
( '384 Patent); 12,156,669 ('669 Patent); and 12,239,333 (12-'333 Patent). See ECF No. 112.

<b>Patent No. &amp; IPR No.</b>	<b>IPR Filing Date</b>	<b>Institution Decision</b>	<b>Oral Argument Date</b>	<b>Final Written Decision Deadline</b>
'011 Patent (IPR2024-01157)	July 8, 2024	<u>Instituted:</u> Jan. 23, 2025	<u>Heard:</u> Oct. 29, 2025	Jan. 16, 2026 All Claims Unpatentable
'691 Patent IPR2024-10257	Aug. 12, 2024	<u>Not Instituted:</u> Feb. 7, 2025	N/A	N/A
'012 Patent (IPR2025-00156)	Nov. 8, 2024	<u>Instituted:</u> Apr. 22, 2025	<u>Heard:</u> Jan. 20, 2026	<u>Expected by:</u> Apr. 22, 2026
'005 Patent (IPR2025-00289)	Dec. 13, 2024	<u>Instituted:</u> June 18, 2025	<u>Hearing date:</u> Mar. 25, 2026	<u>Expected by:</u> June 18, 2026
'921 Patent (IPR2025-00729)	Mar. 13, 2025	<u>Instituted:</u> Oct. 10, 2025	<u>Hearing date:</u> July 23, 2026	<u>Expected by:</u> Oct. 10, 2026
'291 Patent (IPR2025-00989)	May 9, 2025	<u>Instituted:</u> Oct. 23, 2025	<u>Hearing date:</u> July 23, 2026	<u>Expected by:</u> Oct. 23, 2026
11-'333 Patent (IPR2025-01021)	May 19, 2025	<u>Instituted:</u> Dec. 11, 2025	<u>Hearing date:</u> Sept. 10, 2026	<u>Expected by:</u> Dec. 11, 2026
'910 Patent (IPR2025-01025)	May 20, 2025	<u>Instituted:</u> Dec. 11, 2025	<u>Hearing date:</u> Sept. 10, 2026	<u>Expected by:</u> Dec. 11, 2026
'580 Patent (IPR2025-01264)	July 8, 2025	<u>Instituted:</u> Dec. 11, 2025	<u>Hearing date:</u> Sept. 10, 2026	<u>Expected by:</u> Dec. 11, 2026
'384 Patent (IPR2025-01562)	Sept. 19, 2025	<u>Expected:</u> Mar. 26, 2026	N/A	N/A
'669 Patent (IPR2026-00169)	Dec. 16, 2025	<u>Expected:</u> June 17, 2026	N/A	N/A
12-'333 (IPR2026-00215)	Jan. 16, 2026	<u>Expected:</u> ***	N/A	N/A

1 **SO STIPULATED.**

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Respectfully Submitted,  
  
KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: January 21, 2026

By: /s/ Joshua J. Stowell  
Joshua J. Stowell  
Joseph R. Re  
Nicholas A. Belair

*Attorneys for Defendant*  
Imperative Care, Inc.

Dated: January 21, 2026

By: /s/ Ramsey M. Al-Salam (With Permission)  
Ramsey M. Al-Salam  
1201 Third Avenue Suite 4000  
Seattle, WA 98101-3099  
Telephone: 206-359-800  
Email: ralsalam@perkinscoie.com

Amanda Tessar (*pro hac vice*)  
Perkins Coie Llp  
1900 Sixteenth Street  
Suite 1400  
Denver, CO 80202  
303-291-2357  
Email: atessar@perkinscoie.com

Daniel T. Keese, Bar No. 280683  
DKeese@perkinscoie.com  
PERKINS COIE LLP  
1120 NW Couch Street, 10th Floor  
Portland, Oregon 97209-4128  
Telephone: 503.757.2000  
Facsimile: 503.727.2222

Kendrick R. Tyler, Bar No.109506  
RKendrick@perkinscoie.com  
1201 Third Avenue Suite 4900  
Seattle, WA 98101-3099

*Attorneys for Plaintiff*  
Inari Medical, Inc.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**FILER’S ATTESTATION**

Pursuant to Local Rule 5-1(i)(3) regarding signatures, I hereby attest that concurrence in the filing of this document has been obtained from all signatories above.

Dated: January 21, 2026 By: /s/Joshua J. Stowell

Joshua J. Stowell  
Joseph R. Re  
Nicholas A. Belair

*Attorneys for Defendant*  
Imperative Care, Inc.