

**Via U.S. Mail**  
and

**Via Email to:**

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July 30, 2025

Safet Metjahic  
Robert Keeler  
Counsel for Patent Owner, National Steel Car Limited

Ice Miller LLP  
1500 Broadway Suite 2900  
New York, NY 10036

Re: *Sotera* Stipulations in IPR2025-01046, IPR2025-01047, and IPR2025-01048

Counsel:

I wrote by email on July 16, 2025 that FreightCar America would seek authorization from the Board to file a *Sotera* stipulation in each of the above-referenced IPRs. FreightCar America then requested such authorization, but as of July 23, 2025, no panel had been assigned to the IPRs, so the Board has not yet acted on FreightCar America's request.

FreightCar America hereby stipulates to the terms set forth in each of the *Sotera* stipulations that I have attached, relating to the following cases.

| Case No.      | Patent No. | IPR Filed | Notice of Filing Date Accorded |
|---------------|------------|-----------|--------------------------------|
| IPR2025-01046 | 8,166,892  | May 27    | June 18                        |
| IPR2025-01047 | 8,132,515  | May 27    | June 18                        |
| IPR2025-01048 | 8,132,515  | May 27    | June 18                        |

While filing is not necessary to give effect to the attached *Sotera* stipulations, FreightCar America also plans to file the stipulations in the IPRs, when authorized, to provide a complete record to the Board.

Sincerely,



Philip M. Nelson  
Counsel for Petitioner, FreightCar America, Inc.

KNOBBE, MARTENS, OLSON & BEAR, LLP  
2040 Main Street, 14th Floor  
Irvine, CA 92614

Mailed: July 30, 2025

On behalf of **FreightCar America, Inc.**

By: Philip Nelson (Reg. No. 62,676)  
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UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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FREIGHTCAR AMERICA, INC.

Petitioner

v.

NATIONAL STEEL CAR LIMITED,

Patent Owner

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IPR2025-01048

Patent 8,132,515

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**PETITIONER'S *SOTERA* STIPULATION**

Petitioner FreightCar America, Inc. hereby stipulates that, if the Board institutes the above-captioned IPR (No. IPR2025-01048), FreightCar America will not pursue, in the Delaware Litigation (*National Steel Car Limited v. FreightCar America, Inc. et al.*, No. 1:24-cv-00594-JLH-CJB, D. Del.), the same invalidity grounds for the challenged claims raised in the Petition for IPR2025-01048 or any grounds against the challenged claims that FreightCar America reasonably could have raised in that Petition.

Respectfully,

Dated: July 30, 2025

By: Philip Nelson  
Philip Nelson (Reg. No. 62,676)  
Ted M. Cannon (Reg. No. 55.036)  
Justin Gillett (Reg. No. 71,099)  
KNOBBE MARTENS OLSON & BEAR, LLP

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the date below a copy of this **PETITIONER'S SOTERA STIPULATION** is being served electronically on July 30, 2025, to the e-mail addresses shown below:

ICE MILLER LLP  
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1500 Broadway, 29<sup>th</sup> Floor  
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Dated: July 30, 2025

By: Philip Nelson

Philip Nelson (Reg. No. 62,676)  
Ted M. Cannon (Reg. No. 55,036)  
Justin Gillett (Reg. No. 71,099)  
KNOBBE MARTENS OLSON & BEAR, LLP