

October 1, 2024

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Ms. Antoinette Gawin
President and Chief Executive Officer
Terumo BCT, Inc.
10810 West Collins Ave.
Lakewood, CO 80215

Re: Notice of Infringement of Haemonetics' Plasma Collection Patents

Dear Ms. Gawin:

My firm represents Haemonetics Corporation (“Haemonetics”). This letter is to advise you that Terumo BCT, Inc.’s Rika Plasma Donation System™ (including both the currently sold Rika System with Nomogram A and B and the Rika System with iNomi™ Nomogram) (collectively “Rika System”) infringes at least U.S. Patent Nos. 10,758,652, 10,792,416, 10,980,926, 10,980,934, and 11,738,124 (collectively, the “Haemonetics Patents”). Haemonetics has also recently received a Notice of Allowance on a related patent, U.S. Patent Application No. 17/205,374. Terumo BCT and its customers should cease making, using, selling, and offering to sell the Rika System immediately. We understand from CSL public statements advertisements that CSL currently makes available the Rika System with Nomogram A and B. As such, Terumo BCT’s active encouragement of CSL’s direct infringement of the Haemonetics patents makes Terumo BCT further liable for induced infringement. We also understand from CSL public statements that CSL Plasma intends to deploy the Rika System with iNomi™ throughout FY25. Terumo BCT’s active encouragement of CSL’s direct infringement of the Haemonetics patents makes Terumo BCT further liable for induced infringement.

Exemplary claim charts comparing claims of the Haemonetics Patents are attached hereto, demonstrating infringement. To the extent Terumo BCT believes its Rika System does not infringe any of the Haemonetics Patents, please provide a substantive response identifying Terumo BCT’s non-infringement positions for each patent. Absent a substantive response, and if Terumo BCT or any of its customers continue to make, use, sell, or offer for sale the Rika System, I will advise my client to take the steps necessary to protect its rights.

I look forward to the courtesy of your anticipated cooperation and a substantive response no later than October 15, 2024.

Sincerely,

Erik B. Milch

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