

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TREACE MEDICAL CONCEPTS, INC.,

Plaintiff,

v.

ZIMMER BIOMET HOLDINGS, INC. and
PARAGON 28, INC.

Defendants.

C.A. No. 25-592-GBW

STIPULATION AND [PROPOSED] ORDER TO STAY

WHEREAS, Plaintiff Treace Medical Concepts, Inc. (“Plaintiff”) and Defendants Zimmer Biomet Holdings, Inc. and Paragon 28, Inc. (collectively, “Defendants”) have agreed to stay all deadlines in this action by forty-five (45) days in order to accommodate settlement discussions.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, and subject to the approval of the Court, that this action is stayed through October 27, 2025. Defendants’ deadline to move, answer or otherwise respond to Plaintiff’s Amended Complaint (D.I. 12) shall be November 10, 2025.

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Dated: September 12, 2025

SO ORDERED this _____ day of _____ 2025.

The Honorable Gregory B. Williams
United States District Court Judge