

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUASAR SCIENCE LLC

Petitioner,

v.

COLT INTERNATIONAL CLOTHING, INC. d/b/a COLT LED

Patent Owner.

Case: IPR2023-00613
U.S. Patent No. 10,411,582

Case: IPR2023-00614
U.S. Patent No. 10,566,895

JOINT STIPULATION TO EXPUNGE

THE DECLARATION OF BRUCE FINN

IPR2023-00613, U.S. Patent No. 10,411,582
IPR2023-00614, U.S. Patent No. 10,566,895

On May 1, 2024, Petitioner QUASAR SCIENCE LLC (“Petitioner”) and Patent Owner, COLT INTERNATIONAL CLOTHING, INC. (d/b/a COLT LED) (“Patent Owner”) held a telephonic hearing with Judge Weinschenk, Judge Braden, and Judge Yang to discuss the potential withdrawal of the Declarations of Mr. Bruce Finn, Mr. Guillermo Macias, and Mr. Ya Jun Zhang from IPR2023-00611, IPR2023-00613, and IPR2023-00614 and reliance upon those declarations in the Patent Owner Responses. The Board instructed the parties to meet and confer regarding the withdrawal of the declarations and redaction of the briefs. Ultimately, Patent Owner offered Mr. Macias for deposition and the parties agreed to no longer seek to withdraw the declarations of Mr. Macias and Mr. Zhang. Accordingly, the parties hereby stipulate to the expungement of the Declaration of Mr. Bruce Finn, IPR2023-00613, Ex. 2094 and IPR2023-00614, Ex. 2094. Additionally, the parties suggest that the Board should assign no weight to the citation of the Declaration of Mr. Bruce Finn in the Patent Owner Responses.

Accordingly, the parties hereby request the expungement of the Declaration of Mr. Bruce Finn, IPR2023-00613, Ex. 2094 and IPR2023-00614, Ex. 2094.

Dated: May 22, 2024

Respectfully submitted:

/Trenton Ward/
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IPR2023-00613, U.S. Patent No. 10,411,582
IPR2023-00614, U.S. Patent No. 10,566,895

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CERTIFICATE OF SERVICE

In accordance with § 42.6(e)(1), the undersigned certifies that on the 22nd day of May 2024, the above **JOINT STIPULATION TO EXPUNGE THE DECLARATION OF BRUCE FINN** was served, via electronic mail upon the following counsel for Patent Owner:

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