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15 Attorneys for Defendant
16 OPTICIS USA LLC

17 IN THE UNITED STATES DISTRICT COURT
18 FOR THE CENTRAL DISTRICT OF CALIFORNIA
19

20 INNEOS LLC,

21 Plaintiff,

22 v.
23

24 OPTICIS CO., LTD., and
OPTICIS USA LLC,

25 Defendants.
26
27
28

Case No. 8:23-cv-00185-MCS-ADS

**OPTICIS USA'S NOTICE OF
JOINER IN CONNECTION
WITH MOTION TO STAY**

HEARING
September 11, 2023, 9:00 am
Courtroom 7C

Honorable Mark C. Scarsi

1 Defendant Opticis Co. has moved to stay the case pending the outcome of
2 IPR2023-01256, which challenges the sole patent asserted in this case, U.S. Patent
3 No. 7,198,416. (Dkt. 50.) Plaintiff Inneos has opposed. (Dkt. 63.)

4 Inneos asserts the motion should be denied in part because Defendant
5 Opticis USA did not join the motion. (*Id.* at 1, 13.) But in the parties' Joint Rule
6 26(f) Report, which predated the motion, Opticis USA indicated it would join any
7 motion to stay by Opticis Co. (Dkt. 48 at 8.)

8 To remove any ambiguity, Opticis USA hereby gives notice that it joins the
9 motion insofar as it seeks to stay the case pending final resolution of IPR2023-
10 01256.

11 If the Court stays the case now pending final resolution of IPR2023-01256,
12 then Opticis USA agrees that, if the IPR results in a final written decision under
13 35 U.S.C. § 318(a) not later vacated, Opticis USA will not assert (or will stop
14 asserting) in this case that any claim of the '416 patent challenged in the IPR is
15 invalid on any ground Opticis Co. raised or reasonably could have raised during
16 the IPR.

17
18 Respectfully submitted,

19 KNOBBE, MARTENS, OLSON & BEAR, LLP
20

21 August 27, 2023

/s/ Mark Lezama

22 Douglas G. Muehlhauser
23 Mark Lezama
24 Chang Lim
25 Ashley C. Morales
26 John P.B. Hendershott

27 Attorneys for Defendant
28 OPTICIS USA LLC