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7 *Attorney for Defendants*
8 *Winplus North America, Inc.,*
9 *Winplus NA, LLC,*
10 *and ADC Solutions Auto LLC*

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 THE NOCO COMPANY,

14 *Plaintiff*

15 v.

16 WINPLUS NORTH AMERICA,
17 INC., WINPLUS NA, LLC, AND
18 ADC SOLUTIONS AUTO LLC,

19 *Defendants.*

Case No.: 8:23-cv-00269-CJC-DFM

**DEFENDANTS WINPLUS NORTH
AMERICA, INC., WINPLUS NA, LLC,
AND ADC SOLUTIONS AUTO LLC'S
STIPULATION REGARDING
INVALIDITY CONTENTIONS AS TO
U.S. PATENT NO. 11,584,243**

1 Defendants Winplus North America, Inc., Winplus NA, LLC, and ADC
2 Solutions Auto LLC (“Defendants”) submit this stipulation regarding invalidity
3 contentions regarding asserted U.S. Patent No. 11,584,243 (“the ’243 Patent”).

4 ADC Solutions Auto LLC (“ADC”) is challenging certain claims of
5 the ’243 Patent in *Inter Partes* Review Proceeding No. IPR2024-00671. The
6 Petition asserts the following grounds of invalidity:

- 7 1. Claims 1 and 2 are unpatentable under 35 U.S.C. § 103(a) over
8 Richardson (U.S. Publication No. 2013/0154543 A1) in view of Zhao
9 (U.S. Patent No. 9,391,467 B2);
- 10 2. Claims 15, 17, 18, 51, 54, and 57 are unpatentable under 35 U.S.C.
11 103(a) over Richardson in view of Zhao and Dao (U.S. Publication
12 No. 2013/0241488 A1);
- 13 3. Claims 1, 2, 15, 17, 18, and 57 are unpatentable under 35 U.S.C.
14 § 103(a) over Yu (Chinese Utility Model Patent No. CN 202311234
15 U) in view of Paparrizos (U.S. Patent No. 9,219,372 B2); and
- 16 4. Claims 15, 17, 18, 51, 54, and 57 are unpatentable under 35 U.S.C.
17 § 103(a) over Yu in view of Paparrizos and Dao.

18 In this Petition, ADC identified Winplus North America, Inc. and Winplus
19 NA, LLC as real parties in interest, subject to 37 C.F.R. § 42.8(b)(1).

20 Defendants hereby stipulate that if the Patent Trial and Appeal Board
21 institutes IPR on IPR2024-00671, then Defendants will not pursue in this case the
22 specific grounds identified above in connection with the referenced prior art and
23 challenged claims as originally issued on the instituted *inter partes* review
24 petition, or on any other ground for which the Board institutes, that was raised or
25 could have been reasonably raised in the IPR.

26 This stipulation is not intended, and should not be construed, to limit
27 Defendants’ ability to assert invalidity of the asserted claims of the ’243 Patent in
28 this case on any other ground, regardless of whether *inter partes* review is

1 instituted. Likewise, this stipulation is not intended, and should not be construed,
2 to limit Defendants' ability to use the asserted prior art references for any purpose
3 other than invalidity under §§ 102 or 103, regardless of whether *inter partes*
4 review is instituted.

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7 Date: March 12, 2024

Respectfully submitted,

8 By: /s/ Mhare Mouradian
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18 ***LLC***
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CERTIFICATE OF SERVICE

I hereby certify that on this the 12th day of March 2024, I caused the foregoing to be served via electronic mail upon all counsel of record as follows:

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