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VIA EMAIL

J. Hunter Adams
Adams IP
453 Dauphin Street, 2nd Floor
Mobile, AL 36602

Re: *Curtis Industries, LLC v. B&D Technologies, LLC*
- Civil Action No. 1:23-CV-11479

Dear Hunter:

I write regarding the petition for *inter partes* review (IPR) that Curtis is filing today against U.S. Patent No. 10,632,815, which B&D is asserting against Curtis in the above-captioned litigation. Curtis stipulates that if the Patent Trial and Appeal Board institutes the IPR petition filed in IPR2024-01150, then Curtis will not seek resolution in the district court of the grounds set forth in the petition or any grounds that Curtis could have reasonably raised in the petition. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020).

In so stipulating, Curtis seeks to avoid multiple proceedings in different fora addressing the validity of the '815 patent based on any grounds set forth in the petition or any grounds that Curtis could have reasonably raised in the petition. Rather, consistent with Congressional intent, Curtis wishes the Board to address the patentability of the '815 patent over the prior-art references raised (or any that could have reasonably been raised) in IPR.

Very truly yours,

Alexander M. Pechette

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