UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Klein Tools, Inc.,

Petitioner,

v.

Milwaukee Electric Tool Corporation,
Keter Home and Garden Products, Ltd.,

Patent Owners.

IPR2024-01401

Patent No. 11,794,952

PATENT OWNERS' UPDATED MANDATORY NOTICES

Pursuant to 37 C.F.R. § 42.8(b)(3) and § 42.8(b)(4), Patent Owners submit the following mandatory notice information identified in 37 C.F.R. § 42.8(b).

I. MANDATORY NOTICES

A. Real Parties-in-Interest (37 C.F.R. § 42.8(b)(1))

The Patent Owners in this proceeding are Milwaukee Electric Tool Corporation and Keter Home and Garden Products, Ltd. ("Patent Owners"). There are no other real parties-in-interest.

B. Related Matters (37 C.F.R. § 42.8(b)(2))

1. Proceeding before the USPTO involving the patent at issue

The are no other proceedings before the USPTO involving the '026 patent.

2. Proceedings before the USPTO Involving Related Patents

The '026 patent is related to patents involved in the following proceedings before the USPTO:

- IPR2021-00373, filed January 5, 2021 (institution denied).
- IPR2024-01400, filed September 17, 2024.

3. U.S. Patent Applications Related to the Patent-at-Issue

The '026 patent is related to the following U.S. Patent Applications:

- U.S. Application No. 18/628,427, filed April 5, 2024.
- U.S. Application No. 18/628,415, filed April 5, 2024.
- U.S. Application No. 18/330,972, filed June 7, 2023, issued on April 9, 2024 as

U.S. Patent No. 11,952,167.

- U.S. Application No. 17/884,230, filed August 9, 2022.
- U.S. Application No. 17/536,521, filed November 29, 2021, issued on June 21, 2022 as U.S. Patent No. 11,365,026.
- U.S. Application No. 17/391,904, filed August 2, 2021, issued on December 7, 2021 as U.S. Patent No. 11,192,690.
- U.S. Application No. 17/167,925, filed February 4, 2021, issued on June 8, 2021 as U.S. Patent No. 11,027,883.
- U.S. Application No. 17/132,609, filed December 23, 2020, issued on October 17, 2023 as U.S. Patent No. 11,787,599.
- U.S. Application No. 17/064,371, filed October 6, 2020, issued on August 30, 2022 as U.S. Patent No. 11,427,382.
- U.S. Application No. 16/893,591, filed June 5, 2020, issued on October 11, 2022 as U.S. Patent No. 11,465,805.
- U.S. Application No. 16/752,441, filed January 24, 2020, issued on May 18, 2021 as U.S. Patent No. 11,008,136.
- U.S. Application No. 16/216,724, filed December 11, 2018, issued on March 10, 2020 as U.S. Patent No. 10,583,962.
- U.S. Application No. 15/826,232, filed November 29, 2017, issued on July 7, 2020 as U.S. Patent No. 10,703,534.

- U.S. Application No. 15/826,201, filed November 29, 2017, issued on April 20, 2021 as U.S. Patent No. 10,981,696.

4. U.S. Litigations Involving the Patent-at-Issue and Related Patents

The ’026 patent has been asserted against Petitioner Klein Tools, Inc. in separate complaints filed June 13, 2024, in the United States District Court for the Northern District of Illinois and the International Trade Commission ("ITC"):

- *Milwaukee Electric Tool Corporation et al v. Klein Tools, Inc.*, 1:24-cv-04928 (N.D. Ill.); and
- *Milwaukee Electric Tool Corporation et al v. Klein Tools, Inc.*, 337-TA-1409.

Patent owners previously filed but withdrew the following actions:

- *Milwaukee Electric Tool Corporation et al v. Klein Tools, Inc.*, 1:24-cv-04284 (N.D. Ill.) (dismissed);
- *Milwaukee Electric Tool Corporation et al v. Klein Tools, Inc.*, 337-TA-3749 (dismissed).

C. <u>Counsel (37 C.F.R. § 42.8(b)(3)) and Service Information (37 C.F.R. § 42.8(b)(3)-(4))</u>

Patent Owners designate Dion M. Bregman (Reg. No. 45,645) as lead counsel for this matter and designate Jason C. White (Reg. No. 42,223), Scott D. Sherwin (*pro hac vice*), and David P. Bernstein, Ph.D. (Reg. No. 71,064) as back-up counsel for this matter.

Postal mailings and hand deliveries for lead and back-up counsel should be addressed to: Morgan, Lewis & Bockius LLP, 1400 Page Mill Road, Palo Alto, CA, 94304. (Telephone: 650.843.4000; Fax: 650.843.4001).

Pursuant to 37 C.F.R. § 42.8(b)(4), Patent Owners consent to e-mail service at: Metco-KleinTools-IPRs@morganlewis.com.

Dated: January 13, 2025

Respectfully Submitted,

/ Dion M. Bregman /
Dion M. Bregman, Reg. No. 45,645

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), lead counsel for Patent Owners hereby certifies that on January 13, 2025, a copy of this PATENT OWNERS' UPDATED MANDATORY NOTICES was served to the email correspondence address of record for Petitioner's counsel of record:

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Respectfully submitted,

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