

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

STRATASYS, INC.,

Plaintiff,

v.

SHENZHEN TUOZHU TECHNOLOGY CO.,
LTD., SHANGHAI LUNKUO TECHNOLOGY
CO., LTD., BAMBU LAB LIMITED, AND
TUOZHU TECHNOLOGY LIMITED,

Defendants.

Civil Action No. 2:24-cv-00644-JRG
LEAD CASE

Civil Action No. 2:24-cv-00645-JRG
MEMBER CASE

JURY TRIAL DEMANDED

BAMBULAB USA, INC., SHENZHEN
TUOZHU TECHNOLOGY CO., LTD.,
SHANGHAI LUNKUO TECHNOLOGY CO.,
LTD., BAMBULAB LIMITED, AND
TUOZHU TECHNOLOGY LIMITED,

Plaintiffs,

v.

STRATASYS, INC.,

Defendant.

Civil Action No. 2:25-cv-00465-JRG
MEMBER CASE

JURY TRIAL DEMANDED

**DEFENDANTS' DISCLOSURE OF FINAL INVALIDITY THEORIES,
FINAL PRIOR ART REFERENCES/COMBINATIONS, AND FINAL
EQUITABLE DEFENSES FOR CASE NO. 2:24-CV-00644**

Defendants Shenzhen TuoZhu Technology Co., Ltd., Shanghai Lunkuo Technology Co., Ltd., BambuLab Limited, TuoZhu Technology Limited, and BambuLab USA, Inc. (collectively, "Defendants" or "Bambu") hereby disclosure their final invalidity theories, final prior art references/combinations, and final equitable defenses, as set forth in the Court's instruction on trial procedures.

The disclosure below of prior art references and combinations related to Defendants' invalidity theories is not intended to be limiting in any way on the use of other prior art references at trial, including, *e.g.*, prior art references mentioned in expert reports for purposes of background, state of the art, damages, incremental value of the claimed inventions, and other legal issues.¹ Defendants will not assert any equitable defenses.

U.S. Patent No. 9,168,698 Claim 10

- The combination of MakerBot Replicator, Bukkapatnam,² and Igasaki³ renders Claim 10 obvious under 35 U.S.C. § 103.

U.S. Patent No. 10,556,381 Claims 1 and 11

- The combination of MakerBot Replicator and Bukkapatnam renders Claims 1 and 11 obvious under 35 U.S.C. § 103.

U.S. Patent No. 9,421,713 Claims 1 and 6

- KISSlicer PRO alone or in combination with Applicant Admitted Prior Art renders Claims 1 and 6 obvious under 35 U.S.C. § 103.
- Claims 1 and 6 are invalid for lack of written description support for the term “performing a purge operation for each print head or deposition line switched to the operating mode, the purge operation comprising printing at least one purge tower in a layer-by-layer manner” under 35 U.S.C. § 112.

¹ For example, Defendants expect to rely on the disclosures in the Dual Extruder Printing Project with respect to secondary considerations of obviousness for the '713 Patent.

² Bukkapatnam et al., *Dynamic Modeling and Monitoring of Contour Crafting—An Extrusion-Based Layered Manufacturing Process* 129 J. MFG. SCI. & ENGR. 135 (Feb. 2007).

³ U.S. Appl. No. 2008/0195353 to Igasaki et al.

U.S. Patent No. 7,555,357 Claim 8

- The combination of Qiu⁴ and Kao⁵ renders Claim 8 obvious under 35 U.S.C. § 103.

Defendants make this disclosure based on their current knowledge and understanding of the asserted claims, Plaintiff's infringement contentions and expert reports, the parties' exhibit lists and other facts and information available as of today's date. Although this list reflects Defendants' invalidity theories, Defendants reserve the right to present arguments and evidence related to additional prior art in the context of rebutting Plaintiff's theories on the alleged benefits of the patents, consistent with the opinions set forth Defendants' expert reports—and dependent upon the arguments Plaintiff's witnesses make during their direct examinations.

⁴ “Void Eliminating Tool path For Extrusion-Based Multi-Material Layered Manufacturing” by Dan Qiu and Noshir A. Langrana (“Qiu”) (BAMBU-00041403)

⁵ “Optimal Motion Planning for Deposition in Layered Manufacturing” by Ju-Hsien Kao and Fritz B. Prinz (“Kao”) (BAMBU-00041095)

Dated: September 4, 2026

Respectfully submitted,

/s/ Michael A. Vincent

Gregory P. Love (TX 24013060)
glove@cjsjlaw.com
CHERRY JOHNSON SIEGMUND
JAMES PC
104 E Houston Street, Suite 115
Marshall, TX 75670
Tel: (903) 212-4444

Carl E. Bruce (TX 24036278)
bruce@fr.com
Thomas H. Reger, II (TX 24032992)
reger@fr.com
Aaron P. Pirouznia (TX 24098958)
pirouznia@fr.com
Michael A. Vincent (TX 24105738)
vincent@fr.com
FISH & RICHARDSON P.C.
1717 Main Street, Suite 5000
Dallas, TX 75201
Tel: (214) 747-5070

David M. Barkan (CA 160825)
barkan@fr.com
FISH & RICHARDSON P.C.
500 Arguello Street, Suite 400
Redwood City, CA 94063
Tel: (650) 839-5070

Attorneys for Defendants
SHENZHEN TUOZHU TECHNOLOGY CO.,
LTD., SHANGHAI LUNKUO
TECHNOLOGY CO., LTD., BAMBULAB
LIMITED, TUOZHU TECHNOLOGY
LIMITED, AND BAMBULAB USA, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on September 4, 2026, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Michael A. Vincent
Michael A. Vincent