

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ZAXCOM, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 23-1245-JFM
	)	
RODE MICROPHONES, LLC AND	)	
FREEDMAN ELECTRONICS PTY LTD.,	)	
	)	
Defendants.	)	

**DEFENDANTS RØDE MICROPHONES, LLC. AND FREEDMAN ELECTRONICS
PTY LTD.'S MOTION TO STAY PROCEEDINGS**

Defendants Rode Microphones, LLC and Freedman Electronics Pty Ltd. respectfully move the Court to stay all proceedings of this case pending the result of IPR2025-00230, IPR2025-00231, IPR2025-00232, and IPR2025-00557 before the Patent Trial and Appeal Board (“PTAB”) within the United States Patent and Trademark Office, including any appeals therefrom from Final Written Decisions of the PTAB. The grounds for this motion are more fully set forth in the accompanying brief and Declaration of Michael A. Fisher. Pursuant to D. Del. LR 7.1.1, counsel certifies that reasonable efforts have been made to reach agreement on the subject of this motion.

WHEREFORE, Defendants ask that the Court grant this motion and enter the attached proposed order.

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Dated: June 26, 2025

/s/ Nathan R. Hoeschen

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LLC and Freedman Electronics Pty Ltd.*

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v.

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C.A. No. 23-1245-JFM

[PROPOSED] ORDER

At Wilmington this ____ day of _____, 2025, having considered Defendants Rode Microphones, LLC and Freedman Electronics Pty Ltd.’s Motion to Stay Proceedings, and all papers filed in connection therewith;

IT IS HEREBY ORDERED that the Motion is GRANTED and this case is STAYED pending the result of IPR2025-00230, IPR2025-00231, IPR2025-00232, and IPR2025-00557 before the Patent Trial and Appeal Board (“PTAB”) within the United States Patent and Trademark Office, including any appeals therefrom from Final Written Decisions of the PTAB.

United States District Judge