IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CEREBRUM SENSOR TECHNOLOGIES, INC. and TIRE STICKERS LLC,	)	
Plaintiffs,	)	
v.	)	C.A. No. 24-245 (JLH) (SRF)
REVVO TECHNOLOGIES, INC.,	)	
Defendant.	)	

JOINT STATUS REPORT REGARDING PRIVATE MEDIATION

Plaintiffs Cerebrum Sensor Technologies, Inc. and Tire Stickers LLC (collectively, "Cerebrum") and Defendant Revvo Technologies, Inc ("Revvo") submit this joint report in response to the Court's Order dated February 14, 2025 (D.I. 97), which suspended the case schedule pending the parties' stipulation to engage in private mediation (D.I. 96).

Plaintiffs' Statement

On February 23, 2024, Plaintiffs filed the complaint in this case asserting three patents: U.S. Patent No. 10,137,741 ("the '741 Patent"); U.S. Patent No. 11,124,027 ("the '027 Patent"); and U.S. Patent No. 11,835,421 ("the '421 Patent").

Pursuant to the parties' stipulation (D.I. 96), on February 21, 2025, Plaintiffs proposed four mediators to Revvo (followed up with emails dated February 28 and March 12). A month later, on March 21, Revvo emailed to say that it had "begun [its] review of them and are investigating potential alternative individuals." On April 2, Revvo proposed Judge Gregory Sleet as mediator. Two days later, on April 4, Plaintiffs agreed to mediate with Judge Sleet. Since then, Judge Sleet and the parties have been able to coordinate their schedules for a mediation to be conducted on June 18, 2025.

Meanwhile, also on February 21, 2025, Revvo filed IPR petitions on two of the three patents asserted in this lawsuit, the ’027 Patent and the ’421 Patent. Plaintiffs will soon be filing their respective preliminary responses in support of denial of the petitions and their respective briefs requesting that the PTAB exercise its discretion to deny the petitions.

If the mediation on June 18 is unsuccessful, the Plaintiffs will be seeking to lift the stay and enter a revised case schedule. Plaintiffs also intend to move for leave to amend their complaint to add a recently allowed U.S. patent, related to the asserted ’421 Patent, that will be issuing soon. That patent was allowed after the Examiner considered the alleged prior art cited by Revvo in its IPR petition on the ’421 Patent. Thus, Plaintiffs will be asserting at least two patents in this case that are not subject to any IPR petition.

To the extent the case is not dismissed following the mediation, Plaintiffs propose that the parties submit a further status report to the Court on or before June 25, 2025 stating their positions as to how they believe the case should proceed at that time.

Revvo’s Statement

The parties have a private mediation scheduled with (retired) Judge Gregory Sleet for June 18, 2025. Revvo proposes submitting a further joint status report regarding the status of ADR if the case has not been dismissed within two weeks after the scheduled mediation (i.e., on or before July 2, 2025).

The Court’s Oral Order staying the case ordered that “the parties shall submit a joint status report ***regarding the status of ADR*** if the case has not been dismissed on or before May 13, 2025.” (D.I. 97 (emphasis added).) Consistent with the Court’s Order, Revvo has requested that the parties confine this submission to jointly advising the Court on the status of ADR—i.e., that mediation has been scheduled for June 18, 2025. Plaintiffs refused.

To the extent it later proves necessary, Revvo shall respond to the substance of Plaintiffs' Statement at such time.

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May 13, 2025

SO ORDERED this _____ day of May, 2025.

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