

EXHIBIT 2022

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**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:24-cv-00245-JLH-SRF**

Cerebrum Sensor Technologies, Inc. et al v. Revvo Technologies, Inc.

Assigned to: Judge Jennifer L. Hall

Referred to: Judge Sherry R. Fallon

Related Case: [1:25-cv-00962-JLH](#)

Cause: 35:1 Patent Infringement

Date Filed: 02/23/2024

Jury Demand: Plaintiff

Nature of Suit: 830 Patent

Jurisdiction: Federal Question

Plaintiff

Cerebrum Sensor Technologies, Inc.

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Date Filed	#	Docket Text
02/23/2024	<u>1</u>	COMPLAINT for PATENT INFRINGEMENT filed with Jury Demand against Revvo Technologies, Inc. (Filing fee \$ 405, receipt number ADEDC-4346073.) - filed by Tire Stickers LLC, Cerebrum Sensor Technologies, Inc.. (Attachments: # <u>1</u> Exhibit A-K, # <u>2</u> Civil Cover Sheet) (vfm) (Entered: 02/23/2024)
02/23/2024	<u>2</u>	Notice, Consent and Referral forms re: U.S. Magistrate Judge jurisdiction. (vfm) (Entered: 02/23/2024)
02/23/2024	<u>3</u>	Report to the Commissioner of Patents and Trademarks for Patent/Trademark Number(s) 10,137,741; 11,124,027; 11,835,421. (vfm) (Entered: 02/23/2024)
02/23/2024	<u>4</u>	Disclosure Statement pursuant to Rule 7.1: No Parents or Affiliates Listed filed by Cerebrum Sensor Technologies, Inc., Tire Stickers LLC. (vfm) (Entered: 02/23/2024)
02/23/2024	<u>5</u>	Summons Issued as to Revvo Technologies, Inc. on 2/23/2024. (vfm) (Entered: 02/23/2024)
02/23/2024	<u>6</u>	SUMMONS Returned Executed by Tire Stickers LLC, Cerebrum Sensor Technologies, Inc..Revvo Technologies, Inc. served on 2/23/2024, answer due 3/15/2024. (Jacobs, Karen) (Entered: 02/23/2024)
02/28/2024		Case Assigned to Judge Colm F. Connolly. Please include the initials of the Judge (CFC) after the case number on all documents filed. (rjb) (Entered: 02/28/2024)
02/28/2024	<u>7</u>	STANDING ORDER REGARDING BRIEFING IN ALL CASES (nmf) (Entered: 02/28/2024)
03/04/2024	<u>8</u>	MOTION for Pro Hac Vice Appearance of Attorney Christopher D. Bright - filed by Cerebrum Sensor Technologies, Inc., Tire Stickers LLC. (Cucuzzella, Lucinda) (Entered: 03/04/2024)

10/08/2025	114	MOTION to Continue to Suspend All Deadlines Pending Resolution of Inter Partes Review - filed by Revvo Technologies, Inc.. (Attachments: # 1 Text of Proposed Order)Motions referred to Sherry R. Fallon.(Farnan, Kelly) Modified on 10/9/2025 (lih). (Entered: 10/08/2025)
10/08/2025	115	Letter to The Honorable Sherry R. Fallon from Kelly E. Farnan re 114 MOTION to Continue to Suspend All Deadlines Pending Resolution of Inter Partes Review. (Farnan, Kelly) Modified on 10/9/2025 (lih). (Entered: 10/08/2025)
10/10/2025	116	Letter to The Honorable Sherry R. Fallon from Karen Jacobs re 114 MOTION to Continue to Suspend All Deadlines Pending Resolution of Inter Partes Review. (Attachments: # 1 Ex. A, # 2 Ex. B, # 3 Ex. C, # 4 Ex. D, # 5 Ex. E, # 6 Ex. F, # 7 Ex. G, # 8 Ex. H, # 9 Ex. I, # 10 Ex. J, # 11 Ex. K, # 12 Ex. L, # 13 Ex. M)(Jacobs, Karen) Modified on 10/14/2025 (lih). (Entered: 10/10/2025)
10/17/2025	117	ORAL ORDER- re 114 Motion to Stay All Deadlines Pending Resolution of <i>Inter Partes</i> Review ("IPR"). Having reviewed the parties' submissions, (D.I. 115; D.I. 116), IT IS ORDERED that Defendant's motion to stay the case pending resolution of IPR2025-00631 and IPR2025-00632 is DENIED without prejudice. On balance, the three stay factors do not weigh heavily for or against a stay pending IPR, thus, the decision is a close one. <i>See IOENGINE, LLC v. PayPal Holdings, Inc.</i>, C.A. No. 18-452-WCB <i>et al.</i>, 2019 WL 3943058, at *2, 4 (D. Del. Aug. 21, 2019) (emphasizing the discretionary nature of the stay inquiry and the need to consider each request on a case-by-case basis). Although a stay is likely to simplify some of the issues for trial based on the Patent Trial and Appeal Board's ("PTAB") institution of IPR proceedings on two of the three patents-in-suit, the fact remains that Defendant chose not to file an IPR petition for U.S. Patent No. 10,137,741 ("the ' 741 patent"). (D.I. 115 at 1) Thus, the asserted claims of the ' 741 patent will go forward in this case even if Defendant is successful in the IPRs. <i>See Tonal Sys., Inc. v. iFIT Inc.</i>, C.A. No. 20-1197-GBW-CJB, D.I. 188 (D. Del. Feb. 9, 2023) (D.I. 116, Ex. C). Defendant's submissions to the PTAB indicate that it intends to pursue system prior art in different combinations in the district court litigation even if it is unsuccessful in the IPRs, and these limitations on estoppel further restrict the scope of any simplification. (D.I. 116, Ex. I at 14; Ex. J at 20; Ex. M at 1 n.1) Moreover, Defendant's invalidity contentions disclose Section 112 defenses that will not be addressed in the IPRs. For example, Defendant asserts indefiniteness, written description, and enablement defenses. (<i>Id.</i>, Ex. K at 14-26) Defendant also fails to directly address the impact on these proceedings of a related civil action asserting infringement of recently issued U.S. Patent No. 12,344,051 ("the ' 051 patent"). (D.I. 115 at 3) The record before the court confirms that the ' 051 patent raises overlapping issues and, to date, Defendant has not filed an IPR petition on the ' 051 patent. (D.I. 116, Ex. L at ¶ 4) Finally, the IPRs will not fully resolve the claim construction issues in this litigation. Defendant has adopted many of Plaintiffs' proposed claim constructions for purposes of the IPRs, with the exception of the term "cavity" in certain dependent claims of the challenged patents (which relate to tire sensor technology). (D.I. 116 at 3, Exs. G-H) But the ' 741 patent presents disputed claim terms, such as the "vulcanized to[gether]" term, which will not be addressed in the IPRs. (D.I. 116 at 3, Exs. G-H; D.I. 84, Ex. A at 2) Should the potential for inconsistent claim construction rulings arise from parallel IPR proceedings before the PTAB and <i>Markman</i> proceedings in this court, the court may address such issues through case management procedures at the appropriate time. Therefore, the simplification factor does not weigh heavily for or against a stay. (D.I. 116, Ex. C) Second, the status of the litigation is neutral or weighs slightly in favor of Defendant. The parties have conducted substantial fact discovery, although the <i>Markman</i> briefing and proceedings, expert discovery, case dispositive motions, and trial remain to be completed. (D.I. 116, Ex. C) Third, the undue prejudice factor weighs slightly against a stay. There is no dispute that Cerebrum Sensor Technologies, Inc. directly competes with Defendant, a point Defendant

		asserts in its answer and counterclaims. (D.I. 95 at ¶¶ 8, 11, 21, 97-98, 104, 114) Although Defendant presents attorney argument minimizing the amount of competition between the parties, it does not offer any evidence in support of these assertions despite carrying the burden on this motion. (D.I. 115 at 4; D.I. 116, Ex. C) When the parties are direct competitors, the delay caused by a stay gives rise to "outsized consequences to the party asserting infringement has occurred," even when there are other competitors in the market. <i>N. Atl. Imports, LLC v. LoCo-Crazy Good Cookers, Inc.</i> , C.A. No. 23-999-GBW-SRF, 2024 WL 4827250, at *4 (D. Del. Nov. 19, 2024) (citing cases). The prior stay in this case to facilitate settlement discussions does not weigh against Plaintiffs, who submitted a declaration supporting their position that their good faith settlement efforts were met with some resistance and delay. (D.I. 116, Ex. A at ¶¶ 16-17) The timing of Defendant's IPR petitions does not weigh against Defendant even though the petitions were filed near the end of the statutory deadline because it was reasonable for Defendant to wait for a decision on its motion to dismiss and the receipt of Plaintiffs' proposed claim constructions before submitting its IPR petitions. (D.I. 115 at 4) On balance, the stay factors are "close to neutral," and "a clear case for a stay has not been made." (D.I. 116, Ex. C) IT IS FURTHER ORDERED that, on or before October 30, 2025, the parties shall submit a joint proposed order amending the scheduling order at D.I. 38. The court will determine whether to set a Rule 16 scheduling conference upon review of the joint proposed amended order. Ordered by Judge Sherry R. Fallon on 10/17/2025. (lih) (Entered: 10/17/2025)
10/27/2025	118	STIPULATION TO EXTEND TIME to move, answer, or otherwise respond re 95 COUNTERCLAIM to November 3, 2025 - filed by Cerebrum Sensor Technologies, Inc., Tire Stickers LLC. (Ying, Jennifer) Modified on 10/28/2025 (lih). (Entered: 10/27/2025)
10/28/2025		SO ORDERED- re 118 STIPULATION TO EXTEND TIME to move, answer, or otherwise respond re 95 COUNTERCLAIM to November 3, 2025. Reset Answer Deadlines: Cerebrum Sensor Technologies, Inc. answer due 11/3/2025; Tire Stickers LLC answer due 11/3/2025. Signed by Judge Sherry R. Fallon on 10/28/2025. (lih) (Entered: 10/28/2025)
10/31/2025	119	STIPULATION TO EXTEND TIME to submit order amending the scheduling order to November 5, 2025 - filed by Revvo Technologies, Inc.. (Farnan, Kelly) (Entered: 10/31/2025)
10/31/2025		SO ORDERED- re 119 STIPULATION TO EXTEND TIME to submit order amending the scheduling order to November 5, 2025. Signed by Judge Sherry R. Fallon on 10/31/2025. (lih) (Entered: 10/31/2025)
10/31/2025	120	MOTION to Dismiss Defendant's Inequitable Conduct and False Marking Counterclaims and Related Affirmative Defenses Pursuant to Rule 9(B), 12(B)(6) and 12(F) - filed by Cerebrum Sensor Technologies, Inc., Tire Stickers LLC. Motions referred to Sherry R. Fallon.(Ying, Jennifer) (Entered: 10/31/2025)
10/31/2025	121	OPENING BRIEF in Support re 120 MOTION to Dismiss Defendant's Inequitable Conduct and False Marking Counterclaims and Related Affirmative Defenses Pursuant to Rule 9(B), 12(B)(6) and 12(F) filed by Cerebrum Sensor Technologies, Inc., Tire Stickers LLC.Answering Brief/Response due date per Local Rules is 11/14/2025. (Attachments: # 1 Exhibit A, # 2 Exhibit B)(Ying, Jennifer) (Entered: 10/31/2025)
11/05/2025	122	STIPULATION TO EXTEND TIME For The Parties to Submit a Joint Proposed Order Amending the Scheduling Order (see D.I. 117) to November 7, 2025 - filed by Cerebrum Sensor Technologies, Inc., Tire Stickers LLC. (Steingraber, Edward) (Entered: 11/05/2025)