

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SMART DENTURE CONVERSIONS, LLC,

Plaintiff,

v.

STRAUMANN USA, LLC,

Defendant.

C.A. No. 1:24-cv-00507-JCB

**DEFENDANT STRAUMANN USA, LLC’S MOTION FOR A CONDITIONAL STAY  
PENDING THE RESOLUTION OF PARALLEL PTAB PROCEEDINGS**

Defendant Straumann USA, LLC (“Straumann”) respectfully moves for a conditional stay of this case pending the outcome of PTAB proceedings (Case Nos. IPR2025-00956 and PGR2025-00054) that Straumann has filed against each of the patents asserted by plaintiff Smart Denture Conversions, LLC (“SDC”) in this litigation.

In particular, Straumann requests that the Court issue an order now that would automatically stay this case if the PTAB institutes either or both of the foregoing PTAB proceedings, with the stay to take effect on the later of the close of fact discovery (currently December 5, 2025) or the date of the PTAB’s earliest institution decision (likely by December 2, 2025), and with the stay to remain in effect until the PTAB issues its last final decision in the PTAB proceedings.

Straumann respectfully submits that good cause exists to stay this case, for the reasons set forth in Straumann’s opening brief accompanying this motion.

Straumann's counsel made a reasonable effort to reach agreement with plaintiff SDC's counsel concerning Straumann's requested stay, pursuant to D. Del. LR 7.1.1. The parties discussed this motion during a meet-and-confer videoconference held on July 17, 2025. Plaintiff indicated that it will oppose Straumann's motion.

Dated: July 18, 2025

Respectfully submitted,

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