Ramsey M. Al-Salam, Bar No. 109506
RAlSalam@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000

Amanda Tessar, Bar No. 33173 (admitted *pro hac vice*)
ATessar@perkinscoie.com
PERKINS COIE LLP
1900 Sixteenth Street, Suite 1400
Denver, Colorado 80202-5255
Telephone: +1.303.291.2357
Facsimile: +1.303.291.2457

(Additional counsel listed on signature page)

***Attorneys for Plaintiff***
Inari Medical, Inc.

Joseph R. Re (SBN 134,479)
joe.re@knobbe.com
Joshua J. Stowell (SBN 246,916)
joshua.stowell@knobbe.com
KNOBBE, MARTENS, OLSON & BEAR, LLP
2040 Main Street. 14th Floor
Irvine, CA. 92614
(949) 760-0404 Telephone
(949) 760-9502 Facsimile

Nicholas A. Belair (SBN 295,380)
nick.belair@knobbe.com
KNOBBE, MARTENS, OLSON & BEAR, LLP
333 Bush St., 21st Fl.
San Francisco CA 94104
415-217-8399 - Telephone

***Attorneys for Defendant***
Imperative Care, Inc.

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**SAN JOSE DIVISION**

INARI MEDICAL, INC.,

Plaintiff,

v.

IMPERATIVE CARE, INC.,

Defendant.

Civil Action No. 5:24-cv-03117-EKL-SVKx

**JOINT STIPULATION TO CONTINUE THE STAY OF LITIGATION PENDING IPR DECISIONS AND VACATE UPCOMING CASE MANAGEMENT CONFERENCE**

Hon. Eumi K. Lee

*Imperative Care v. Inari Medical*
IPR2025-00989
**Imperative Care Ex. 1031**

Plaintiff Inari Medical, Inc. ("Inari") and Defendant Imperative Care, Inc. ("Imperative Care") (collectively "the Parties") hereby submit this joint stipulation to continue the stay of the litigation pending the issuance of the next IPR decision and to reset the upcoming case management conference for early May.

This is a patent infringement case where Inari asserts eleven patents from the three patent families against Imperative Care. On September 29, 2025, the Court issued an Order Granting in Part Imperative Care's Motion to Stay (ECF No. 137). In that Order, the Court stayed the action in its entirety until February 4, 2026, and scheduled a further case management conference for January 28, 2026, at 1:30 p.m. via Zoom video. The Court also ordered the parties to file a joint case management statement by January 21, 2026 that (1) provides an update regarding the status of all pending IPR proceedings as to the patents asserted by Inari in this action, (2) identifies and discusses the significance of any new IPR petitions that were filed, and any institution decisions that have issued, during the pendency of the stay, and (3) addresses whether the stay should be extended or lifted.

Consistent with the Court's Order, the Parties have provided an update on the status of all the pending IPR proceedings below.

The Parties have also met and conferred regarding the stay. Inari has proposed continuing the stay until after the Patent Trial and Appeal Board ("PTAB") has issued a Final Written Decision in IPR2025-00156 relating to U.S. Patent No. 11,697,012. The PTAB is statutorily required to issue a Final Written Decision in that IPR by April 22, 2026.

While Imperative Care submits that the stay should remain in effect until after resolution of all the pending IPRs, Imperative Care does not oppose Inari's proposal to continue the stay until after the next Final Written Decision, at which point the Parties will again update the Court regarding the status of the IPRs and address whether the stay should be extended.

Thus, with the Court's permission, the Parties agree to the following:

- The case management conference scheduled for January 28, 2026 is vacated.

- A further case management conference is set for May 6, 2026 (or a date convenient for the Court).
- This action is STAYED in its entirety until the date of the next case management conference.
- The parties shall file a joint case management statement by April 29, 2026, not to exceed ten pages. In the statement, the parties shall provide an update regarding the status of all pending IPR proceedings as to the patents asserted by Inari in this action. The parties shall identify and discuss the significance of any institution decisions and final written decisions that have issued during the pendency of the stay. The parties shall also address whether the stay should be extended.

**UPDATE REGARDING STATUS OF PENDING IPRS**

Inari asserts eleven patents against Imperative Care in this lawsuit.[1] *See* Third Am. Compl., ECF No. 112. Inari also previously asserted, but withdrew, infringement claims involving a twelfth patent (U.S. Patent No. 11,697,011, the '011 Patent). *See* Compl., ECF No. 1; Second. Am. Compl., ECF No. 68.

Imperative Care has filed IPR petitions challenging the validity of all twelve patents. As shown in the table below, the PTAB has instituted eight IPRs on the '011 Patent, '012 Patent, '005 Patent, '921 Patent, '291 Patent, 11-'333 Patent, '910 Patent, and '580 Patent. The PTAB has denied institution of one IPR (the '691 Patent). The Parties are awaiting institution decisions for three IPRs covering the '384 Patent, '669 Patent, and 12-'333 Patent.

The PTAB issued a final written decision for the (withdrawn) '011 Patent on January 16, 2026. In the Final Written Decision, the PTAB found all claims (Claims 1-9) of the '011 Patent unpatentable.

---

[1] The asserted patents asserted include U.S. Patent Nos. 11,697,012 ('012 Patent); 11,744,691 ('691 Patent); 11,554,005 ('005 Patent); 11,844,921 ('921 Patent); 11,865,291 ('291 Patent); 11,969,333 (11-'333 Patent); 11,974,910 ('910 Patent); 12,016,580 ('580 Patent); 12,109,384 ('384 Patent); 12,156,669 ('669 Patent); and 12,239,333 (12-'333 Patent). *See* ECF No. 112.

| Patent No. & IPR No. | IPR Filing Date | Institution Decision | Oral Argument Date | Final Written Decision Deadline |
|---|---|---|---|---|
| ’011 Patent (IPR2024-01157) | July 8, 2024 | Instituted: Jan. 23, 2025 | Heard: Oct. 29, 2025 | Jan. 16, 2026 All Claims Unpatentable |
| ’691 Patent IPR2024-10257 | Aug. 12, 2024 | Not Instituted: Feb. 7, 2025 | N/A | N/A |
| ’012 Patent (IPR2025-00156) | Nov. 8, 2024 | Instituted: Apr. 22, 2025 | Heard: Jan. 20, 2026 | Expected by: Apr. 22, 2026 |
| ’005 Patent (IPR2025-00289) | Dec. 13, 2024 | Instituted: June 18, 2025 | Hearing date: Mar. 25, 2026 | Expected by: June 18, 2026 |
| ’921 Patent (IPR2025-00729) | Mar. 13, 2025 | Instituted: Oct. 10, 2025 | Hearing date: July 23, 2026 | Expected by: Oct. 10, 2026 |
| ’291 Patent (IPR2025-00989) | May 9, 2025 | Instituted: Oct. 23, 2025 | Hearing date: July 23, 2026 | Expected by: Oct. 23, 2026 |
| 11-’333 Patent (IPR2025-01021) | May 19, 2025 | Instituted: Dec. 11, 2025 | Hearing date: Sept. 10, 2026 | Expected by: Dec. 11, 2026 |
| ’910 Patent (IPR2025-01025) | May 20, 2025 | Instituted: Dec. 11, 2025 | Hearing date: Sept. 10, 2026 | Expected by: Dec. 11, 2026 |
| ’580 Patent (IPR2025-01264) | July 8, 2025 | Instituted: Dec. 11, 2025 | Hearing date: Sept. 10, 2026 | Expected by: Dec. 11, 2026 |
| ’384 Patent (IPR2025-01562) | Sept. 19, 2025 | Expected: Mar. 26, 2026 | N/A | N/A |
| ’669 Patent (IPR2026-00169) | Dec. 16, 2025 | Expected: June 17, 2026 | N/A | N/A |
| 12-’333 (IPR2026-00215) | Jan. 16, 2026 | Expected: *** | N/A | N/A |

**SO STIPULATED.**

Respectfully Submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: January 21, 2026

By: */s/ Joshua J. Stowell*
Joshua J. Stowell
Joseph R. Re
Nicholas A. Belair

*Attorneys for Defendant*
Imperative Care, Inc.

Dated: January 21, 2026

By: */s/ Ramsey M. Al-Salam (With Permission)*
Ramsey M. Al-Salam
1201 Third Avenue Suite 4000
Seattle, WA 98101-3099
Telephone: 206-359-800
Email: ralsalam@perkinscoie.com

Amanda Tessar (*pro hac vice*)
Perkins Coie Llp
1900 Sixteenth Street
Suite 1400
Denver, CO 80202
303-291-2357
Email: atessar@perkinscoie.com

Daniel T. Keese, Bar No. 280683
DKeese@perkinscoie.com
PERKINS COIE LLP
1120 NW Couch Street, 10th Floor
Portland, Oregon 97209-4128
Telephone: 503.757.2000
Facsimile: 503.727.2222

Kendrick R. Tyler, Bar No.109506
RKendrick@perkinscoie.com
1201 Third Avenue Suite 4900
Seattle, WA 98101-3099

*Attorneys for Plaintiff*
Inari Medical, Inc.

**FILER'S ATTESTATION**

Pursuant to Local Rule 5-1(i)(3) regarding signatures, I hereby attest that concurrence in the filing of this document has been obtained from all signatories above.

Dated: January 21, 2026

By: */s/Joshua J. Stowell*
Joshua J. Stowell
Joseph R. Re
Nicholas A. Belair

*Attorneys for Defendant*
Imperative Care, Inc.