Mailed: July 30, 2025

On behalf of **FreightCar America, Inc.**
By: Philip Nelson (Reg. No. 62,676)
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UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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FREIGHTCAR AMERICA, INC.
Petitioner
v.

NATIONAL STEEL CAR LIMITED,
Patent Owner

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IPR2025-01046
Patent 8,166,892

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# PETITIONER'S *SOTERA* STIPULATION

Petitioner FreightCar America, Inc. hereby stipulates that, if the Board institutes the above-captioned IPR (No. IPR2025-01046), FreightCar America will not pursue, in the Delaware Litigation (*National Steel Car Limited v. FreightCar America, Inc. et al.*, No. 1:24-cv-00594-JLH-CJB, D. Del.), the same invalidity grounds for the challenged claims raised in the Petition for IPR2025-01046 or any grounds against the challenged claims that FreightCar America reasonably could have raised in that Petition.

Respectfully,

Dated: July 30, 2025 By: Philip Nelson

Philip Nelson (Reg. No. 62,676)
Ted M. Cannon (Reg. No. 55.036)
Justin Gillett (Reg. No. 71,099)
KNOBBE MARTENS OLSON & BEAR, LLP



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FreightCar America Inc. v. National Steel Car Limited
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## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date below a copy of this **PETITIONER'S SOTERA STIPULATION** is being served electronically on July 30, 2025, to the e-mail addresses shown below:

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Dated: July 30, 2025 By: Philip Nelson

Philip Nelson (Reg. No. 62,676)
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