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Philip M. Nelson
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Via U.S. Mail
and
Via Email to:
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Robert.Keeler@icemiller.com
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July 30, 2025

Safet Metjahic
Robert Keeler
Counsel for Patent Owner, National Steel Car Limited

Ice Miller LLP
1500 Broadway Suite 2900
New York, NY 10036

Re: *Sotera* Stipulations in IPR2025-01046, IPR2025-01047, and IPR2025-01048

Counsel:

I wrote by email on July 16, 2025 that FreightCar America would seek authorization from the Board to file a *Sotera* stipulation in each of the above-referenced IPRs. FreightCar America then requested such authorization, but as of July 23, 2025, no panel had been assigned to the IPRs, so the Board has not yet acted on FreightCar America's request.

FreightCar America hereby stipulates to the terms set forth in each of the *Sotera* stipulations that I have attached, relating to the following cases.

Case No.	**Patent No.**	**IPR Filed**	**Notice of Filing Date Accorded**
IPR2025-01046	8,166,892	May 27	June 18
IPR2025-01047	8,132,515	May 27	June 18
IPR2025-01048	8,132,515	May 27	June 18

While filing is not necessary to give effect to the attached *Sotera* stipulations, FreightCar America also plans to file the stipulations in the IPRs, when authorized, to provide a complete record to the Board.

Sincerely,

Philip Nelson

Philip M. Nelson
Counsel for Petitioner, FreightCar America, Inc.

KNOBBE, MARTENS, OLSON & BEAR, LLP
2040 Main Street, 14th Floor
Irvine, CA 92614

Mailed: July 30, 2025

On behalf of **FreightCar America, Inc.**
By: Philip Nelson (Reg. No. 62,676)
Ted M. Cannon (Reg. No. 55.036)
Justin Gillett (Reg. No. 71,099)
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FREIGHTCAR AMERICA, INC.
Petitioner
v.

NATIONAL STEEL CAR LIMITED,
Patent Owner

IPR2025-01047
Patent 8,132,515

PETITIONER'S *SOTERA* STIPULATION

Petitioner FreightCar America, Inc. hereby stipulates that, if the Board institutes the above-captioned IPR (No. IPR2025-01047), 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 IPR2025-01047 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

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:

ICE MILLER LLP
Safet Metjahic
Robert Keeler
1500 Broadway, 29th Floor
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Email: Safet.Metjahic@icemiller.com
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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