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August 18, 2025

The Honorable Gregory B. Williams  
United States District Court  
844 North King Street  
Wilmington, DE 19801-3555

*VIA ELECTRONIC FILING*

Re: *Baby Jogger, LLC v. Baby Generation, Inc. d/b/a Mockingbird,*  
*C.A. No. 24-725 (GBW)*

Dear Judge Williams:

I write on behalf of Defendant Baby Generation, Inc. d/b/a Mockingbird in response to Plaintiff Baby Jogger, LLC's letter dated August 15, 2025 (D.I. 24). As noted therein, Defendant's position is that the parties should not begin discovery until the Court has had the opportunity to resolve Defendant's motion to dismiss for lack of standing (D.I. 18). Unlike other instances where the Court has ordered the parties to conduct a Rule 26(f) conference and proceed with discovery while a motion to dismiss is pending, Defendant's motion, if granted, would dispose of this case in its entirety and, therefore, it would conserve both party and judicial resources to wait for the Court's ruling, particularly when the Plaintiff has waited so long to move the case forward.

This case was filed in June 2024. Over a year later, on August 11, 2025, Plaintiff's counsel contacted Defendant's counsel and requested that the parties conduct a Rule 26(f) conference and submit a proposed scheduling order. Plaintiff's belated request to initiate discovery – over a year after filing this case – appears to be largely motivated by the recent filing of IPRs directed to all of the asserted patents and, more specifically, an upcoming deadline for briefing pursuant to the PTAB's new discretionary denial process. In response, Defendant notified Plaintiff that it intends to immediately file a motion to stay the case until the Court has resolved Defendant's pending motion to dismiss. Defendant intends to do so this week.

Respectfully,

*/s/ Jeremy A. Tigan*

Jeremy A. Tigan (#5239)

cc: All Counsel of Record (via CM/ECF and e-mail)

**MOCKINGBIRD ET AL. EX1071**  
**MOCKINGBIRD ET AL. V. BABY JOGGER**  
**IPR2025-01095**