From: Taylor R. Stemler <TStemler@MerchantGould.com>
Sent: Wednesday, August 13, 2025 10:22 AM
To: Hoekel, Jennifer
Cc: HB - Champion; jmf@zpatents.com; rlt@zpatents.com; tjz@zpatents.com; GeneracChampMGTEAM; Monique L. Kreutz; Paul J. Stockhausen; Monica A. Mark; {F6332953}.Active@ef.merchantgould.com
Subject: RE: Champion v. Generac - Stipulation of Invalidity Contentions [IMAN-DB1.FID6332953]

Hi Jennifer,

It was nice meeting you and Sharif this morning. Thank you for speaking with us.

We understand from our discussion that Champion does not think that a stay of the litigation makes sense at this time, but that it may be amenable to a stay of the case pending the result of the discretionary denial or institution decisions in one or more of the IPRs.

Best regards,

Taylor

Taylor R. Stemler
Attorney
Merchant & Gould P.C.
150 South Fifth Street
Suite 2200
Minneapolis, MN 55402-4247
USA

Telephone (612) 371-5215
Fax (612) 332-9081
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From: Taylor R. Stemler
Sent: Tuesday, August 5, 2025 7:26 AM
To: Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>
Cc: HB - Champion <HB-Champion@huschblackwell.com>; jmf@zpatents.com; rlt@zpatents.com; tjz@zpatents.com; GeneracChampMGTEAM <GeneracChampMGTEAM@MerchantGould.com>; Monique L. Kreutz <mkreutz@merchantgould.com>; Paul J. Stockhausen <pstockhausen@reinhartlaw.com>; Monica A. Mark

EX1061
HARBOR FREIGHT TOOLS
IPR2025-01121

<mmark@reinhartlaw.com>; {F6332953}.Active@ef.merchantgould.com
Subject: RE: Champion v. Generac - Stipulation of Invalidity Contentions [IMAN-DB1.FID6332953]

Hi Jennifer,

That time works for us. I will circulate a meeting invitation.

Best regards,

Taylor

Taylor R. Stemler
Attorney
Merchant & Gould P.C.
150 South Fifth Street
Suite 2200
Minneapolis, MN 55402-4247
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From: Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>
Sent: Monday, August 4, 2025 7:54 PM
To: Taylor R. Stemler <TStemler@MerchantGould.com>
Cc: HB - Champion <HB-Champion@huschblackwell.com>; jmf@zpatents.com; rlt@zpatents.com; tjz@zpatents.com; GeneracChampMGTEAM <GeneracChampMGTEAM@MerchantGould.com>; Monique L. Kreutz <mkreutz@merchantgould.com>; Paul J. Stockhausen <pstockhausen@reinhartlaw.com>; Monica A. Mark <mmark@reinhartlaw.com>; {F6332953}.Active@ef.merchantgould.com
Subject: Re: Champion v. Generac - Stipulation of Invalidity Contentions [IMAN-DB1.FID6332953]

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How about 10 am central on the 13th?

Sent from my iPhone

On Aug 4, 2025, at 3:43 PM, Taylor R. Stemler <TStemler@merchantgould.com> wrote:

[EXTERNAL EMAIL]

Hi Jennifer,

Thanks for getting back to me on this. We are available to confer at the below times (central time). Please let us know what works for you, and we can circulate a meeting invite.

8/8, between 9am and 12:30pm;
8/11, between 9:30am and 1pm;
8/13, before 10:30am.

Best regards,

Taylor

Taylor R. Stemler
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From: Hoekel, Jennifer <Jennifer.Hoekel@huschblackwell.com>
Sent: Wednesday, July 30, 2025 3:59 PM
To: Taylor R. Stemler <TStemler@MerchantGould.com>; HB - Champion <HB-Champion@huschblackwell.com>; jmf@zpatents.com; rlt@zpatents.com; tjz@zpatents.com
Cc: GeneracChampMGTEAM <GeneracChampMGTEAM@MerchantGould.com>; Monique L. Kreutz <mkreutz@merchantgould.com>; Paul J. Stockhausen <pstockhausen@reinhartlaw.com>; Monica A. Mark <mmark@reinhartlaw.com>; {F6332953}.Active@ef.merchantgould.com
Subject: RE: Champion v. Generac - Stipulation of Invalidity Contentions [IMAN-DB1.FID6332953]

CAUTION - External.

Taylor:

Thank you for your email. We believe that a meet and confer is warranted in light of your request for a stay. Please provide some dates and times for next week?

Jennifer

Jennifer Hoekel

(she/her/hers)

Partner
Direct: 314-345-6123
Mobile: 314-401-9716
Jennifer.Hoekel@huschblackwell.com

From: Taylor R. Stemler <TStemler@MerchantGould.com>
Sent: Wednesday, July 23, 2025 6:24 PM
To: HB - Champion <HB-Champion@huschblackwell.com>; jmf@zpatents.com; rlt@zpatents.com; tjz@zpatents.com
Cc: GeneracChampMGTEAM <GeneracChampMGTEAM@MerchantGould.com>; Monique L. Kreutz <mkreutz@merchantgould.com>; Paul J. Stockhausen <pstockhausen@reinhartlaw.com>; Monica A. Mark <mmark@reinhartlaw.com>; {F6332953}.Active@ef.merchantgould.com
Subject: Champion v. Generac - Stipulation of Invalidity Contentions [IMAN-DB1.FID6332953]

Counsel,

As you are aware, Generac has filed a petition for inter partes review ("IPR") challenging certain claims of U.S. Patent 10,393,034. With regard to the prior art grounds in that petition and in this litigation, Generac stipulates to the following, as provided in the attached stipulation:

"Generac hereby stipulates, broader than the stipulation made by the Petitioner in *Sotera* that, if the PTAB institutes an IPR (and does not subsequently vacate institution) in response to Generac's petition against Champion's U.S. Patent No. 10,393,034 in IPR2025-00805, Generac will not pursue in this litigation invalidity of the claims challenged in that petition based on: (i) the specific grounds raised in IPR2025-00805, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground based on system prior art (either alone or in combination with other references) that directly corresponds to a printed publication reference asserted as part of a ground raised in IPR2025-00805."

As you are also aware, Generac has also filed IPR petitions on U.S. Patent Nos. 11,143,120; 10,598,101; 11,306,667; 10,221,780; and 11,905,896, which are all pending institution decisions, and Generac intends to petition for IPRs on the remaining patents-in-suit in short order: U.S. Patent Nos. 10,697,398; 11,143,145; 11,530,654; 11,492,985; 11,840,970; 11,905,895; and 11,761,390. I confirm that Generac intends to stipulate to the same scope for each of the pending IPR petitions as well as subsequent IPR petitions on patents-in-suit in the above captioned case.

I also write to confirm that Generac intends to seek a stay of this litigation in its entirety pending final resolution of all pending IPRs on the patents-in-suit. Please advise us of your position and whether Champion will agree to such a stay.

Best regards,

Taylor

Taylor R. Stemler
Attorney
Merchant & Gould P.C.
150 South Fifth Street
Suite 2200
Minneapolis, MN 55402-4247
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<image002.png>