

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MWE INVESTMENTS, LLC,
HARBOR FREIGHT TOOLS USA INC., and
GENERAC POWER SYSTEMS, INC.,
Petitioners

v.

CHAMPION POWER EQUIPMENT INC.,
Patent Owner.

Case IPR2025-01185

U.S. Patent No. 10,221,780

PETITIONER HARBOR FREIGHT’S MOTION TO WITHDRAW

Mail Stop “PATENT BOARD”
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. §42.10 and the Board's January 5, 2026 e-mail (EX3002) authorizing this motion, Petitioner Harbor Freight requests to withdraw from this proceeding. In addition, Harbor Freight's counsel, Michael R. Houston, Jeffrey S. Gundersen and Kimberly K. Dodd, all of Foley & Lardner LLP, seek to withdraw as back-up counsel from this proceeding. Petitioner Generac's lead counsel and back-up counsel remain unchanged to Harbor Freight's knowledge.

Petitioner Harbor Freight's and its counsels' withdrawal is pursuant to a settlement reached between it and Patent Owner. A copy of the settlement agreement, which is the only agreement between Harbor Freight and Champion related to this proceeding, is being concurrently filed as Exhibit 1300 under a "Board Only" designation accompanied by a Request to Keep Confidential. However, because another co-petitioner remains in this proceeding (Generac), Petitioner Harbor Freight **is not** requesting adverse judgment or termination of this IPR.

Counsel for Patent Owner does not oppose this motion.

Dated: January 12, 2026

Respectfully submitted,

By: s/Michael R. Houston/

Michael R. Houston
Reg. No. 58,486
FOLEY & LARDNER LLP
321 N. Clark St., Suite 3000
Chicago, Illinois 60654
312-832-4500

mhouston@foley.com

Counsel for Petitioner Harbor Freight

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **MOTION TO WITHDRAW** was served on January 12, 2026, via the PTACTS system and via electronic mail on the following counsel of record for Petitioner:

Joseph Staley
Email: j.staley@pkhip.com
Timothy Ziolkowski
Email: tjz@zpatents.com
Jacob Fritz
Email: jmf@zpatents.com
Thomas Finch
Email: t.finch@pkhip.com
Scott P. Amy
Email: s.amy@pkhip.com
Email: championlit@pkhip.com
Email: rlt@zpatents.com

s/Michael R. Houston/

Michael R. Houston
Reg. No. 58,486
FOLEY & LARDNER LLP
321 N. Clark St., Suite 3000
Chicago, Illinois 60654
312-832-4500
mhouston@foley.com

Counsel for Petitioner Harbor Freight