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13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 SOUTHERN (SANTA ANA) DIVISION

17 MERIDIAN INTERNATIONAL CO.,
18 LTD.,

18 Plaintiff,

19 v.

20 TOUGHBUILT INDUSTRIES, INC.,

21 Defendant.

Case No. 8:24-cv-01840-JWH-JDE

DEFENDANT'S NOTICE OF INTER
PARTES REVIEWS AND
STIPULATION REGARDING
INVALIDITY CONTENTIONS AS TO
U.S. PATENT NOS. 11,986,946
AND 11,192,689

Judge: John W. Holcomb

24 Defendant ToughBuilt Industries, Inc. ("ToughBuilt") submits this notice and
25 stipulation regarding the two patents-in-suit--U.S. Patent Nos. 11,986,946 (the "'946
26 patent") and 11,192,689 (the "'689 patent") (collectively, the "patents-in-suit").
27 ToughBuilt is challenging the claims of the '946 patent in *Inter Partes* Review

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8:24-cv-01840-JWH-JDE
DEFENDANT'S NOTICE AND STIPULATION REGARDING INVALIDITY
CONTENTIONS AS TO U.S. PATENT NOS. 11,986,946 AND 11,192,689

ToughBuilt EX1031
ToughBuilt v. Meridian
IPR2025-01461

1 Proceeding No. IPR2025-01461, a copy of which is attached as exhibit 1. ToughBuilt
2 is challenging the claims of the '689 patent in *Inter Partes* Review Proceeding No.
3 IPR2025-01462, a copy of which is attached as exhibit 2.

4 In the petitions, ToughBuilt is a real party in interest, subject to 37 C.F.R. §
5 42.8(b). In connection with the petitions, ToughBuilt hereby stipulates that if the
6 Patent Trial and Appeal Board institutes *inter partes* review on the grounds presented
7 in ToughBuilt's petitions, ToughBuilt will not pursue an invalidity defense in this
8 case that the patent claims subject to the instituted *inter partes* review are invalid
9 based on any ground that ToughBuilt raised or reasonably could have raised in the
10 petitions.¹

11 This stipulation is limited to the grounds in ToughBuilt's two IPR Petitions
12 described above. This stipulation is not intended, and should not be construed, to
13 limit ToughBuilt's ability to assert invalidity of any claims of the patents-in-suit on
14 any other ground, regardless of whether *inter partes* review is instituted. Likewise,
15 this stipulation is not intended, and should not be construed, to limit ToughBuilt's
16 ability to use the asserted prior art references for any purpose other than invalidity
17 under §§ 102 or 103, regardless of whether *inter partes* review is instituted.

18 ToughBuilt submits this stipulation in anticipation of its motion to stay this
19 case pending resolution of the IPRs.

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26 ¹ The language in this stipulation tracks the language of the estoppel provisions
27 of 35 U.S.C. § 315(e), and ToughBuilt intends this language to be interpreted in
28 accordance with the Federal Circuit's decision in *Ingenico Inc. v. IOENGINE, LLC*,
136 F.4th 1354 (Fed. Cir. 2025).

1 Dated: September 5, 2025

PERKINS COIE LLP

2
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CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all attorneys of record in this matter:

/s/ Ramsey M. Al-Salam
Ramsey M. Al-Salam

Notices

[8:24-cv-01840-JWH-JDE Meridian International Co., Ltd. v. ToughBuilt Industries, Inc.](#)

ACCO,
(JDEx), **AO120**, DISCOVERY, MANADR, PROTORD

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Notice of Electronic Filing

The following transaction was entered by Al-Salam, Ramsey on 9/5/2025 at 3:32 PM PDT and filed on 9/5/2025

Case Name: Meridian International Co., Ltd. v. ToughBuilt Industries, Inc.

Case Number: [8:24-cv-01840-JWH-JDE](#)

Filer: ToughBuilt Industries, Inc.

Document Number: [116](#)

Docket Text:

Notice filed by Defendant ToughBuilt Industries, Inc.. *NOTICE OF INTER PARTES REVIEWS AND STIPULATION OF DEFENDANT REGARDING INVALIDITY CONTENTIONS AS TO PATENTS-IN-SUIT* (Attachments: # (1) Exhibit 1 - IPR Petition re U.S. Patent No. 11,986,946, # (2) Exhibit 2- IPR Petition re U.S. Patent No. 11,192,689)(Al-Salam, Ramsey)

8:24-cv-01840-JWH-JDE Notice has been electronically mailed to:

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8:24-cv-01840-JWH-JDE Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:C:\fakepath\2025-9-5 Sotera Stipluation - TB.pdf

Electronic document Stamp:

[STAMP cacdStamp_ID=1020290914 [Date=9/5/2025] [FileNumber=40874251-0]
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Document description:Exhibit 1 - IPR Petition re U.S. Patent No. 11,986,946

Original filename:C:\fakepath\2025-9-5 Exhibit 1 to Sotera Stipulation - TB.pdf

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Document description:Exhibit 2- IPR Petition re U.S. Patent No. 11,192,689

Original filename:C:\fakepath\2025-9-5 Exhibit 2 to Sotera Stipulation - TB.pdf

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