

**From:** [Halsey, Anna](#)  
**To:** [rbemben-ptab@sternekessler.com](mailto:rbemben-ptab@sternekessler.com); [ttang-ptab@sternekessler.com](mailto:ttang-ptab@sternekessler.com); [PTAB Account](#)  
**Cc:** [Fort, Ann](#); [Spier, Jeremy](#); [Kriz, Lindsay](#)  
**Subject:** ToughBuilt IPR Nos. 2025-01461 and -01462: Initial Disclosures  
**Date:** Wednesday, December 3, 2025 4:40:06 PM

---

Counsel:

As you may know, our deadlines to file our POPRs are soon approaching, along with the deadlines to set forth any agreement as to Initial Disclosures pursuant to 37 C.F.R. § 42.51(a). Although institution is statistically unlikely, we wanted to reach out to obtain agreement on these disclosures, if possible, in case any of the IPRs were to go forward.

Because the IPRs at issue “seek[] cancellation of one or more claims in whole or in part on the basis of the alleged obviousness of one or more of the claims,” we believe Option 2, as set forth in the Office Patent Trial Practice Guide, is the appropriate disclosure.

Please let us know if we may submit this by agreement, or if we will be required to file a motion seeking this discovery from you in the event of institution.

Best regards,

Anna

**Anna Carr Halsey** | Special Counsel, Atlanta  
She | Her | Hers

[annahalsey@eversheds-sutherland.com](mailto:annahalsey@eversheds-sutherland.com)  
T: +1.404.853.8173  
M: +1.404.273.0932  
[Biography](#) [LinkedIn](#)  
999 Peachtree Street NE, Suite 2300, Atlanta, GA 30309

**Eversheds Sutherland**

Helping our clients, our people and our communities to thrive

*We are a global team representing global clients, and my business day window may not be the same as yours. Please do not feel the need to respond outside of your working hours.*