

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TOUGHBUILT INDUSTRIES, INC.,  
Petitioner

v.

MERIDIAN INTERNATIONAL CO., LTD.,  
Patent Owner

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Case IPR2025-01462  
U.S. Patent No. 11,192,689

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**PETITIONER TOUGHBUILT INDUSTRIES, INC.’S  
*SOTERA* STIPULATION**

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

**PETITIONER'S UPDATED EXHIBIT LIST**

| <b>Exhibit No.</b> | <b>Description</b>                                                                                                         |
|--------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1001               | U.S. Patent No. 11,192,689 B2 to Cai, issued December 7, 2021 (“the ’689 patent”)                                          |
| 1002               | File History of U.S. Patent No. 11,192,689 (“Prosecution History”)                                                         |
| 1003               | Declaration of Dr. J. Michael McCarthy in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 11,192,689 |
| 1004               | <i>Curriculum Vitae</i> of Dr. J. Michael McCarthy                                                                         |
| 1005               | EP 3492226 A1 to Brocket (“Brocket”)                                                                                       |
| 1006               | U.S. Publication No. 2007/0215015 to Heinrichs et al. (“Heinrichs”)                                                        |
| 1007               | U.S. Publication No. 2007/0012694 to Duvigneau (“Duvigneau”)                                                               |
| 1008               | U.S. Publication No. 2015/0151661 to Morel et al. (“Morel”)                                                                |
| 1009               | U.S. Patent No. 6,238,031 B1 to Weng, issued May 29, 2001 (“Weng”)                                                         |
| 1010               | U.S. Publication No. 2019/0002004 to Brunner et al. (“Brunner”)                                                            |
| 1011               | U.S. Patent No. 4,576,307 to Frydenberg (“Frydenberg”)                                                                     |
| 1012               | U.S. Patent No. 4974740 to Niles et al. (“Niles”)                                                                          |
| 1013               | Plaintiff Meridian Int’l Co. Ltd.’s Infringement Contentions                                                               |
| 1014               | EP Search report EP20170368.3 (Oct. 30 2020)                                                                               |
| 1015               | Meridian EP Amendment and Response in EP20170368.3 (Oct. 5, 2021)                                                          |
| 1016               | U.S. Publication No. 2015/0274362 to Christopher et al. (“Christopher”)                                                    |

| Exhibit No. | Description                                                                                                                                                                                                                                                                                                          |
|-------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1017        | U.S. Publication No. 5,461,731 to Shida (“Shida”)                                                                                                                                                                                                                                                                    |
| 1018        | U.S. Publication No. 2020/0298392 to Baruch et al. (“Baruch”)                                                                                                                                                                                                                                                        |
| 1019        | U.S. Publication No. 2003/0094392 to Meier et al. (“Meier”)                                                                                                                                                                                                                                                          |
| 1020        | Chinese Utility Model No. 206841966 U to Wang (“Wang”)                                                                                                                                                                                                                                                               |
| 1021        | U.S. Publication No. 2008/0000899 to Baker et al. (“Baker”)                                                                                                                                                                                                                                                          |
| 1022        | U.S. Patent No. 5,934,466 to Loeffler (“Loeffler”)                                                                                                                                                                                                                                                                   |
| 1023        | U.S. Publication No. 2019/0291922 to Gonitiner et al., (“Gonitiner922”)                                                                                                                                                                                                                                              |
| 1024        | U.S. Patent No. 9,725,209 B1 to Ben-Gigi (“Ben-Gigi”)                                                                                                                                                                                                                                                                |
| 1025        | U.S. Publication No. 2019/0315515 to Gonitiner et al. (“Gonitiner515”)                                                                                                                                                                                                                                               |
| 1026        | U.S. Patent No. 9,962,826 to Surridge (“Surridge”)                                                                                                                                                                                                                                                                   |
| 1027        | U.S. Publication No. 2008/0121547 to Dur et al. (“Dur”)                                                                                                                                                                                                                                                              |
| 1028        | U.S. Patent No. 6,592,000 to Owens et al. (“Owens”)                                                                                                                                                                                                                                                                  |
| 1029        | Non-Infringement and Invalidity Report of J. Michael McCarthy, Ph.D., <i>Meridian Int’l Co., Ltd. v. ToughBuilt Industries, Inc.</i> , Civil Action No. 8:24-cv-01840 (C.D. Cal.)                                                                                                                                    |
| 1030        | 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 [116], <i>Meridian Int’l Co., Ltd. v. ToughBuilt Industries, Inc.</i> , Civil Action No. 8:24-cv-01840 (C.D. Cal.) with Notice of Electronic Filing Dated Sept, 5, 2025 |

U.S. Patent No. 11,192,689 is currently at issue in related district court litigation *Meridian Int'l Co., Ltd. v. ToughBuilt Industries, Inc.*, Civil Action No. 8:24-cv-01840 (C.D. Cal.) (“the District Court Proceeding”).

Petitioner ToughBuilt Industries, Inc. provided a stipulation in the District Court Proceeding, which is submitted as Exhibit 1030. The language of this stipulation is consistent with *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (P.T.A.B. Dec. 1, 2020) (precedential as to § II.A) and 35 U.S.C. § 315(e). The language in this stipulation tracks the language of the estoppel provisions of 35 U.S.C. § 315(e), and Petitioner intends this language to be interpreted in accordance with the Federal Circuit’s decision in *Ingenico Inc. v. IOENGINE, LLC*, 136 F.4th 1354 (Fed. Cir. 2025).

Respectfully submitted,

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**CERTIFICATE OF SERVICE (37 C.F.R. §§ 42.6(e))**

I certify that the above-captioned **PETITIONER TOUGHBUILT INDUSTRIES, INC.’S *SOTERA* STIPULATION** and **EXHIBIT 1030** was served in its entirety on September 24, 2025, upon the following parties via electronic mail:

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