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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN (SANTA ANA) DIVISION

MERIDIAN INTERNATIONAL CO., LTD., Plaintiff, v. TOUGHBUILT INDUSTRIES, INC., 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. AND 11,986,946 AND 11,192,689 Judge: John W. Holcomb

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

ToughBuilt EX1030
ToughBuilt v. Meridian
IPR2025-01462

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

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

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

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

[1] The language in this stipulation tracks the language of the estoppel provisions of 35 U.S.C. § 315(e), and ToughBuilt 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).

Dated: September 5, 2025

PERKINS COIE LLP

By: /s/ *Ramsey M. Al-Salam*

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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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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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0600c21d550fa2f59c414dce289a49cf1cb29c84ef323070a4108f70ad51]]
Document description: Exhibit 1 - IPR Petition re U.S. Patent No. 11,986,946

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[STAMP cacdStamp_ID=1020290914 [Date=9/5/2025] [FileNumber=40874251-1] [5587e0049d3ea756c7951412b3f54d0ca74abd3f6c692f1cc2a1c3a2d7e989256608edf8cfd6fa059dd09c0b02a54b8d1cb160cdaba373504466d82f693de358]]
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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