From:	Liddle, Bradley
To:	Brzozowski, David; Pomeroy, Michael; Cabrera, Jason; Golob, Barry; Gonsalves, Nancy; Maldonado, Amanda I.; Link, Douglas W
Cc:	*** GDC-SharkNinja-Chefman; Lwalsh@walsh.law; Katelyn O"Reilly; btroyan@walsh.law; Jessica K. Formichella
Subject:	SharkNinja Operating LLC, et al. v. RJ Brands, LLC (1:24-cv-08984) - Sotera Stipulation
Date:	Tuesday, December 23, 2025 12:19:10 PM

Counsel –

RJ Brands, LLC d/b/a Chefman ("Chefman") hereby notifies Plaintiffs SharkNinja Operating LLC, SharkNinja Sales Company, and SharkNinja (Hong Kong) Company, Ltd. ("SharkNinja" or "Plaintiffs") that Chefman is submitting the following "Sotera stipulation" in connection with its petitions for inter partes review of U.S. Patent Nos. 11,672,377 (the "'377 Patent) and 11,389,026 (the "'026 Patent"), challenged respectively in IPR2025-01530 and IPR2025-01529. See *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (PTAB Dec. 1, 2020) ("Sotera").

Chefman hereby stipulates, consistent with the stipulation made by the petitioner in *Sotera*, that, if the PTAB institutes inter partes review in IPR2025-01530 and/or IPR2025-01529, Chefman will not pursue in this litigation invalidity of any claim of the '377 patent and/or the '026 patent that is subject to institution on any ground that was raised or reasonably could have been raised in the instituted IPR or IPRs.

This Sotera stipulation is not intended, and should not be construed, to limit Chefman's ability to assert invalidity of any claims of the '377 patent or the '026 patent on any other grounds.

Best Regards,

Bradley Liddle
Member | Cozen O'Connor
1717 Main Street, Suite 3100 | Dallas, TX 75201
P: 214-462-3139
Email | Map | cozen.com