

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Stanley Black & Decker, Inc.
Petitioner

v.

Howmet Aerospace Inc.
Patent Owner

IPR2025-01581
U.S. Patent No. 11,885,358

PETITIONER'S STIPULATION

After Petitioner Stanley Black & Decker, Inc. filed its IPR petition, Patent Owner Howmet Aerospace Inc. filed a patent infringement lawsuit asserting the challenged U.S. Patent No. 11,885,358 (“the ’358 Patent”) against three of Petitioner’s real parties in interest. *See Howmet Aerospace Inc. v. Stanley Engineered Fastening, LLC., Avdel UK Ltd. and Avdel Holding Limited*, 1-25-cv-01335 (D. Del.) (“Delaware Suit”).

If this IPR2025-01581 is instituted, unless institution is later vacated, reversed or otherwise withdrawn (e.g., by rehearing or Director Review), Petitioner stipulates on behalf of itself, its real parties in interest, and any privy thereof, that they will not raise in the Delaware Suit or in any other parallel proceeding any 35 U.S.C. §§ 102 or 103 prior art invalidity ground against the ’358 Patent that:

- (i) was raised in IPR2025-01581,
- (ii) could have been reasonably raised in IPR2025-01581 (i.e., any ground that could be reasonably raised under §§ 102 or 103 on the basis of prior art patent(s) and/or printed publications), or
- (iii) includes system art (i.e., prior art that is not a patent or printed publication) corresponding to any reference in the invalidity grounds raised in IPR2025-01581 (i.e., Corbett (U.S.P.A.P. 2018/0111184A1) (Ex. 1003), Kleinman (U.S.P.A.P. 2006/0251490A1) (Ex. 1006), Brewer (U.S.P.A.P. 2016/0215808A1) (Ex. 1004), Kendall (U.S.

Patent No. 4,702,655) (Ex. 1005), and/or Fulbright (U.S. Patent No. 5,315,755) (Ex. 1019)).

Petitioner reserves the right to strengthen this stipulation in the future, for example in response to the potential future adoption of a USPTO rule obliging petitioners to make a stronger stipulation to maintain an IPR.

Respectfully submitted,

December 12, 2025

/s/ Jack S. Barufka
Jack S. Barufka (Reg. 37,087)
Counsel for Petitioner

Certificate of Service

Pursuant to 37 CFR §§ 42.6(e)(1), the undersigned certifies that on December 12, 2025, the attached PETITIONER’S STIPULATION was served by filing this document through the P-TACTS system and by emailing this document to the following counsel for Patent Owner:

- Heath J. Briggs: BriggsH@gtlaw.com
- Scott Bornstein: Scott.Bornstein@gtlaw.com
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December 12, 2025

/s/ Benjamin L. Kiersz
Benjamin L. Kiersz (Reg. 51,875)