

1 John D. Esterhay, Bar No. 282330
2 JEsterhay@perkinscoie.com
3 Kyle R. Canavera, Bar No. 314664
4 KCanavera@perkinscoie.com
5 Wei Yuan, Bar No. 315388
6 WYuan@perkinscoie.com
7 **PERKINS COIE LLP**
8 11452 El Camino Real, Ste 300
9 San Diego, California 92130-2080
10 Telephone: +1.858.720.5700
11 Facsimile: +1.858.720.5799

12 *Attorneys for Plaintiffs*
13 *Beatbot Technology (USA) Co. Ltd.,*
14 *Deepwater Innovation Technology (Hong*
15 *Kong) Limited, Xingmai Innovation*
16 *Technology (Suzhou) Co., Ltd.*

17 UNITED STATES DISTRICT COURT
18 SOUTHERN DISTRICT OF CALIFORNIA

19 BEATBOT TECHNOLOGY (USA)
20 CO. LTD., DEEPWATER
21 INNOVATION TECHNOLOGY
22 (HONG KONG) LIMITED, and
23 XINGMAI INNOVATION
24 TECHNOLOGY (SUZHOU) CO.,
25 LTD.,

26 Plaintiffs,

27 v.

28 ZODIAC POOL SYSTEMS LLC,
Defendant.

Case No. 3:25-cv-01946-GPC-JLB

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION TO STAY**

Date: April 3, 2026

Time: 1:30 PM

Courtroom: 12A, 12th Floor

Judge: Hon. Gonzalo P. Curiel

Mag Judge: Hon. Jill L. Burkhardt

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT on April 3, 2026 at 1:30 PM, or as soon
3 thereafter as the matter may be heard in the courtroom of the Honorable Gonzalo P.
4 Curiel of the above-titled Court, located at Courtroom 12A of the James M. Carter
5 and Judith N. Keep Courthouse, 333 W. Broadway, San Diego, CA 92101, Plaintiffs
6 will and hereby do move this Court for an order to stay the litigation until Patent
7 Office proceedings challenging the validity of the asserted patents via *inter partes*
8 review (“IPR”) are complete. Counsel for Plaintiffs notified counsel for Defendant
9 of the intended motion and sought Defendant’s position, and counsel for Defendant
10 indicated it is discussing the motion with Defendant.

11 Plaintiffs’ motion is made pursuant to this Court’s inherent discretion to
12 manage its docket, the early stage of this litigation, the simplification of the disputed
13 issues in this litigation via completion of the IPR process, and the lack of any undue
14 prejudice or tactical disadvantage to Plaintiff and is based on this Notice of Motion,
15 the Memorandum of Points and Authorities, the Declaration of Kyle R. Canavera
16 filed and served herewith, any reply papers submitted in support of this motion, the
17 complete records and files of this action, and any argument or additional evidence
18 permitted by the Court.

1 Dated: January 28, 2026

PERKINS COIE LLP

By: /s/ Kyle R. Canavera

John D. Esterhay, Bar No. 282330

JEsterhay@perkinscoie.com

Kyle R. Canavera, Bar No. 314664

KCanavera@perkinscoie.com

Wei Yuan, Bar No. 315388

WYuan@perkinscoie.com

Attorneys for Plaintiffs *Beatbot
Technology (USA) Co. Ltd., Deepwater
Innovation Technology (Hong Kong)
Limited, And Xingmai Innovation
Technology (Suzhou) Co., Ltd.*