UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WYBOTICS, CO. LTD.
f/k/a Tianjin Wangyuan Environmental Protection and Technology Co., Ltd.
Petitioner

v.

ZODIAC POOL SYSTEMS LLC
Patent Owner

U.S. Patent Nos. 11,003,191; 11,262,766; 11,880,207

PETITIONER'S STIPULATION

Petitioner Wybotics, Co. Ltd. ("Wybotics") hereby stipulates that, for each of the *inter partes* review ("IPR") proceedings listed below, if the Patent Trial and Appeal Board ("PTAB") institutes IPR (and neither the institution nor the final written decision resulting from the proceeding is later vacated, withdrawn, or reversed by the Board, the Director, or the USPTO), then Wybotics and any real party in interest or privy of Wybotics will not pursue invalidity grounds with respect to the challenged claims under 35 U.S.C. §§ 102 or 103 in *Zodiac Pool Systems LLC v. Wybotics, Co. Ltd. f/k/a Tianjin Wangyuan Environmental Protection and Technology Co.*, 2:25-cv-582-JRG-RSP (E.D. Tex. Filed May 23, 2025), nor in *Wybotics Inc. v. Zodiac Pool Systems LLC*, 2:25-cv-08526 CAS (AGRx) (C.D. Cal. Filed Sept. 9, 2025).

- IPR2026-00158, challenging claims 1-3 of U.S. Patent No. 11,003,191
- IPR2026-00159, challenging claims 1-5 of U.S. Patent No. 11,262,766
- IPR2026-00160, challenging claims 1-8, 11-14, and 19 of U.S. Patent No. 11,880,207

To avoid any doubt, for each of the IPR proceedings listed above, if the PTAB declines institution (or if the institution or final written decision resulting from the proceeding is later vacated, withdrawn, or reversed by the Board, the Director, or the USPTO), then Wybotics reserves the right to pursue the grounds of

the denied petition or any other grounds in the aforementioned EDTX 2:25-cv-582-JRG-RSP and CDCA 2:25-cv-08526 CAS (AGRx) litigations.

Dated: March 2, 2026

/Joshua R. Nightingale/

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