Ton, Thao

From: Flannery, Liz
Sent: Tuesday, May 26, 2026 4:42 PM
To: Bombach, Miguel; Juergens, Alexis K.; Foley-Service-Jinko-SEG
Cc: DL SEGSolar/ShanghaiJinko; Ton, Thao
Subject: RE: RE: Shanghai Jinko Green Energy Enterprise Management Co., Ltd. et al v. SEG Solar, Inc. et al (SDTX, Case No. 2:25-cv-05226-AHB)

Jinko Counsel,

We write to update the stipulation previously made relevant to the above-captioned case and to IPR2026-00230. If IPR is instituted in IPR2026-00230, unless institution is later vacated, reversed, or otherwise withdrawn by rehearing, Director Review, or otherwise, Sunnexus Singapore Pte. Ltd.; SEG Holdings Inc.; SEG Land Holdings LLC; SEG Iberia SL; Jun Zhuge; SEG Land Holdings II LLC; and Global Energy Imports Inc. join the IPR Petitioners in stipulating that they will not pursue in this related district court case (Shanghai Jinko Green Energy Enterprise Management Co., Ltd. and Zhejiang Jinko Solar Co., Ltd. v. SEG Solar, Inc. et al., Case No. 25-cv-5226 (S.D. Tx.)) against U.S. Patent No. 11,824,136, the specific grounds asserted in the IPR, any other ground that could have been reasonably raised in the IPR (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), and combinations of the prior art asserted in the IPR with unpublished system prior art (or any other type of prior art).

Thanks,
Liz Flannery

From: Flannery, Liz
Sent: Wednesday, April 8, 2026 12:47 PM
To: Bombach, Miguel <miguel.bombach@foley.com>; Juergens, Alexis K. <ajuergens@foley.com>; Foley-Service-Jinko-SEG <foleyservicejinkoseg@foley.com>
Cc: DL SEGSolar/ShanghaiJinko <DLSEGSolarShanghaiJinko@BakerBotts.com>
Subject: RE: Shanghai Jinko Green Energy Enterprise Management Co., Ltd. et al v. SEG Solar, Inc. et al (SDTX, Case No. 2:25-cv-05226-AHB)

Jinko Counsel,

We write to provide the following stipulation relevant to the above-captioned case and to IPR2026-00230. If IPR is instituted in IPR2026-00230, unless institution is later vacated, reversed, or otherwise withdrawn by rehearing, Director Review, or otherwise, SEG Manufacturing Inc., New Energy Imports Inc., PT SEG Solar Manufaktur Indonesia, SEG Energy Singapore Pte. Ltd., and SEG Solar Inc. ("IPR Petitioners") each stipulate that they will not pursue in this related district court case (Shanghai Jinko Green Energy Enterprise Management Co., Ltd. and Zhejiang Jinko Solar Co., Ltd. v. SEG Solar, Inc. et al., Case No. 25-cv-5226 (S.D. Tx.)) against U.S. Patent No. 11,824,136, the specific grounds asserted in the IPR, any other ground that could have been reasonably raised in the IPR (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), and combinations of the prior art asserted in the IPR with unpublished system prior art (or any other type of prior art).

Thanks,
Liz Flannery

Liz Durham Flannery
Partner

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