UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Meishan CRRC Fastening System Co., Ltd.,

Petitioner,

v.

Howmet Aerospace Inc.,

Patent Owner.

Case No. IPR2026-00268
U.S. Patent 11,885,358

PETITIONER'S OFFERED STIPULATION

Consistent with *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020), if the Board institutes *inter partes* review in IPR2026-00268, and if Patent Owner subsequently initiates litigation against Petitioner or any real party in interest of the Petitioner in any forum in which invalidity may be asserted ("parallel litigation"), Petitioner hereby stipulates on behalf of itself and its real parties in interest, that they will not pursue, in the parallel litigation (i) any ground of invalidity under 35 U.S.C. §§ 102 or 103 that is asserted in this *inter partes* review, or (ii) any ground of invalidity under 35 U.S.C. §§ 102 or 103 that was raised or reasonably could have been raised in this i*nter partes* review based on patents or printed publications, against the Challenged Claims of U.S. Patent No. 11,885,358.

To be clear, this stipulation does not extend to scenarios where the USPTO institutes but later vacates institution of IPR2026-00268, or otherwise terminates the IPR proceeding without issuing an appealable Final Written Decision, as those scenarios would no longer involve an instituted *inter partes* review.

Petitioner will strengthen this stipulation if necessary to comply with future USPTO rules or Director guidance regarding such stipulations.

Date: July 10, 2026

Respectfully submitted,

/Cyrus A. Morton/
Cyrus A. Morton

Cyrus A. Morton
Reg. No. 44,954
Robins Kaplan LLP
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402

Li Zhu
Reg. No. 73,465
Robins Kaplan LLP
555 Twin Dolphin Drive, Suite 310
Redwood City, CA 94065

Attorneys for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served on July 10, 2026, by electronic mail to Patent Owner's counsel at the following addresses indicated in Patent Owner's Mandatory Notices:

BriggsH@gtlaw.com
Scott.Bornstein@gtlaw.com
Trenton.Ward@gtlaw.com
Joseph.Agostino@gtlaw.com

Dated: July 10, 2026

/Cyrus A. Morton/

Cyrus A. Morton
Registration No. 44,954
ROBINS KAPLAN LLP
800 LaSalle Avenue, Suite 2800
Minneapolis, Minnesota 55402
CMorton@RobinsKaplan.com