

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QD OXFORD UK LIMITED, and
QUANTUM DESIGN INTERNATIONAL INC.,
Petitioners,

v.

MAYBELL QUANTUM INDUSTRIES, INC.,
Patent Owner.

IPR2026-00291
U.S. Patent No. 12,313,320

PETITIONERS' STIPULATION

Petitioners QD Oxford UK Limited and Quantum Design International Inc. (collectively, “Petitioners”) hereby stipulate that, if the Patent Trial and Appeal Board institutes *inter partes* review in this proceeding based on the grounds identified below, Petitioners will be bound by the full scope of estoppel under 35 U.S.C. § 315(e)(2) in the related district court litigation, *Maybell Quantum Industries, Inc. v. QD Oxford UK Limited et al*, C.A. No. 1:25-cv-00949 (D. Del.).

Ground	Claims	Basis	Reference(s)
1	1-6, 8, 17-19	§103	Batey, Dain
2	1-4	§103	Batey, PWS
3	1-6, 8, 17-19	§103	Chow, Dain
4	1-3, 5-6, 8	§§102,103	Garside
5	1-3, 5, 17-19	§§102,103	Wikus

In particular, if the requested *inter partes* review is instituted, Petitioners will not pursue in the district court litigation: (i) the specific grounds raised in this proceeding; (ii) any other ground that reasonably could have been raised in this proceeding; and (iii) any other ground based on a combination of system art with any prior art reference asserted as the basis of a ground in this proceeding with respect to U.S. Patent No. 12,313,320. Accordingly, this stipulation ensures that this proceeding would be a “true alternative” to the district court proceeding because Petitioners agree not to pursue any grounds after institution in the district court that are within the scope of the statutory estoppel. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (Dec. 1, 2020).

Dated: June 22, 2026

Respectfully submitted,

/ Andrew J. Gray IV /

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