

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

MAYBELL QUANTUM INDUSTRIES,	)	
INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 25-949-MN
	)	
OXFORD INSTRUMENTS PLC and	)	
OXFORD INSTRUMENTS	)	
NANOTECHNOLOGY TOOLS LTD.,	)	
	)	
Defendants.	)	

STIPULATION AND ORDER TO SUBSTITUTE PARTIES

WHEREAS, on July 29, 2025, Plaintiff Maybell Quantum Industries, Inc. (“Maybell”) filed a Complaint against Oxford Instruments plc (“OI”) and Oxford Instruments Nanotechnology Tools Ltd.(“OINT”);

WHEREAS, on January 2, 2026, Quantum Design completed its acquisition of the Oxford Nanoscience business (“the Acquisition”);

WHEREAS, OI and OINT seek to substitute QD Oxford UK Limited (“QDOUK”) and Quantum Design International Inc. (“QDI”) as the defendants in this action;

WHEREAS, OI, OINT, QDOUK, and QDI represent that, as a result of the Acquisition, QDI acquired all assets and liabilities (including historic liabilities) relating to the Oxford Nanoscience business, including all liabilities that relate to Maybell’s allegations and claims against OI and OINT in the Complaint;

WHEREAS, QDOUK and QDI represent that, with QDOUK and QDI in the case, Maybell will have named as a defendant the Quantum Design entities that make, sell, import, or offer for sale in the United States the products that Maybell accuses of infringement in the Complaint;

WHEREAS, QDOUK and QDI represent that QDOUK and QDI are able to and will satisfy any judgment in this action for infringement of the asserted patents;

WHEREAS, OI and OINT represent that any documents, materials, and witnesses that could have been obtained from OI and OINT if they had remained in the case were included in QDOUK and QDI's acquisition of the Oxford Nanoscience business;

WHEREAS, if Maybell requests discovery that remains in possession of OI or OINT, OI and OINT agree to cooperate with QDOUK, QDI, and/or Maybell to produce those documents or witnesses as if OI and OINT were a "party" under Rules 30 and 34 of the Federal Rules of Civil Procedure, in accordance with, and subject to, applicable United States, foreign, and international laws without waiver of any objections, including as to relevance or privilege;

WHEREAS, in reliance on the above representations by OI, OINT, QDOUK, and QDI, Maybell agrees that QDOUK and QDI may be substituted for OI and OINT as defendants in the case;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties and subject to the approval of the Court, that:

1. Effective service of process has been made upon QDOUK and QDI, and QDOUK and QDI will not challenge venue in the District of Delaware for the purpose of this litigation;
2. In the event the above representations are untrue or incomplete in such a manner that Maybell determines that OI and OINT should be a party to this action, any amendment to the

pleadings adding OI and OINT as a defendant in the case shall relate back to the date of this stipulation;

3. QDOUK and QDI are hereby substituted for OI and OINT as defendants pursuant to Fed. R. Civ. P. 25(c).

4. The terms “Oxford Instruments” and “Defendants” as used in the Complaint, D.I. 1, are hereby amended to refer to QD Oxford UK Limited and Quantum Design International Inc.

5. This substitution is without waiver of any defenses that QDOUK and QDI may have.

6. The updated case caption is as follows:

MAYBELL QUANTUM INDUSTRIES,	)	
INC.	)	
	)	
Plaintiff,	)	
	)	C.A. No. 25-0949-MN
v.	)	
	)	
QD OXFORD UK LIMITED and	)	
QUANTUM DESIGN INTERNATIONAL	)	
INC.	)	
	)	
Defendants.	)	

/s/ Andrew E. Russell

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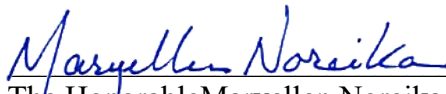
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*Counsel for to-be-substituted Defendants QD
Oxford UK Limited and Quantum Design
International Inc.*

SO ORDERED this 27th day of January 2026.


The Honorable Maryellen Noreika
United States District Judge