UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BEATBOT TECHNOLOGY (USA) CO. LTD.,

Petitioner,

v.

ZODIAC POOL SYSTEMS LLC,

Patent Owner.

Case No. IPR2026-00395

U.S. Patent No. 11,003,191 B2

PETITIONER'S SOTERA PLUS STIPULATION

Petitioner Beatbot Technology (USA) Co. Ltd. ("Petitioner") hereby stipulates that, if and when the Board institutes *inter partes* review in this proceeding (IPR2026-00395), Petitioner and any real parties in interest (RPIs) in the co-pending district court proceeding, *Beatbot Technology (USA) Co. Ltd. et al. v. Zodiac Pool Systems LLC f/k/a Zodiac Pool Systems, Inc.*, No. 3:25-cv-01946 (S.D. Cal.), will not advance against the claims challenged in IPR2026-00395 in the co-pending district court proceeding: (i) the specific grounds raised in IPR2026-00395; (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications); or (iii) any ground based on a combination of system prior art and the prior art patents or printed publications described in (i) or (ii).

Dated: August 6, 2026

Respectfully submitted,

/ Kyle R. Canavera /

Lead Counsel
Kyle R. Canavera, Reg. No. 72,167

Back-up Counsel
Wei Yuan, Reg. No. 71,772
Xiaobing Zhang, Reg. No. 63,929
Bing Ai, Reg. No. 43,312
Babak Tehranchi, Reg. No. 55,937

Attorneys for Petitioner

ASHURST PERKINS COIE US LLP
11452 El Camino Real, Suite 300
San Diego, CA 92130

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing PETITIONER'S SOTERA PLUS STIPULATION has been served on Patent Owner at the following address:

Michael T. Morlock, mmorlock@ktslaw.com
Christopher S. Leah, cleah@ktslaw.com

Dated: August 6, 2026

By: */Anita Chou /*
Anita Chou
Paralegal