UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BECKMAN COULTER, INC., Plaintiff, v. CYTEK BIOSCIENCES, INC., Defendant.	C.A. No. 1:24-cv-00945-CFC-EGT **DEMAND FOR JURY TRIAL**

CYTEK'S CORRECTED ELECTION OF ASSERTED PRIOR ART GROUNDS

Pursuant to the Court's Stipulation and Order Amending Scheduling Order (D.I. 178), Defendant and Counter-claimant Cytek Biosciences, Inc. ("Cytek") hereby serves on Beckman Coulter, Inc. ("BEC") its Corrected Election of Asserted Prior Art Grounds for U.S. Patent Nos. 10,330,582 (the "'582 patent"); 11,703,443 (the "'443 patent"); and 12,174,107 (the "'107 patent") (collectively, the "Asserted Patents") electing the following §§ 102/103 grounds from references previously disclosed in Cytek's Invalidity Contentions:

'582 patent	Challenge Basis	Prior Art Grounds
Claim 1, 3, 6, 23, 26	§ 103	• BD FACSArray System and Lemoff-864 • Cytek's Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors and Luminex System • Cytek's Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors and BD FACSArray System • Luminex System and Lemoff-864 • Oostman-537, Lemoff-864, and Frazier-402 Each of the foregoing combinations may also be supplemented with the knowledge of a person of ordinary skill in the art.

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'443 patent	Challenge Basis	Prior Art Grounds
Claims 6, 10, 11, 15	§ 102	• Cytek's Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors
	§ 103	• BD LSR-II System and Lemoff-864 • Cytek's Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors • Luminex System and Lemoff-864 • Oostman-537 and Lemoff-864 Each of the foregoing combinations may also be supplemented with the knowledge of a person of ordinary skill in the art.
Claim 4	§ 102	• Cytek's Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors
	§ 103	• BD LSR-II System and Lemoff-864 • Cytek's Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors and Lemoff-864 • Luminex System and Lemoff-864 • Oostman-537 and Lemoff-864 Each of the foregoing combinations may also be supplemented with the knowledge of a person of ordinary skill in the art.

'107 patent	Challenge Basis	Prior Art Grounds
Claims 5, 16, 26, 27, 29	§ 103	• BD FACSArray System and Lemoff-864 • Cytek's Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors and BD FACSArray System • Cytek's Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors and Luminex System • Luminex System and Lemoff-864 • Oostman-537, Lemoff-864, and Frazier-402 Each of the foregoing combinations may also be supplemented with the knowledge of a person of ordinary skill in the art.
Claim 18	§ 103	• BD FACSArray System, Oostman-537, and Lemoff-864

’107 patent	Challenge Basis	Prior Art Grounds
		• Cytek’s Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors and BD FACSArray System • Cytek’s Curved-Mirror DxP Wavelength Division (de)Multiplexer Detectors and Luminex System • Luminex System and Lemoff-864 • Oostman-537, Lemoff-864, and Frazier-402 Each of the foregoing combinations may also be supplemented with the knowledge of a person of ordinary skill in the art.

Cytek reserves all rights to supplement or amend this election of asserted prior art grounds. For example, Cytek’s election and reduction of asserted prior art grounds is made based on Cytek’s current understanding of BEC’s claimed priority dates for each of the Asserted Patents, BEC’s infringement contentions, including its Second Election of Asserted Claims, and BEC’s responses to Interrogatory Nos. 1, 2, 3, 20, and 21. Cytek reserves the right to supplement or amend its election of asserted prior art grounds should BEC’s contentions regarding any of these issues change. Cytek further reserves the right to supplement or amend its election of asserted prior art grounds based on any further claim construction order provided by the Court. Discovery is also on-going, including discovery of BEC and third-party prior art. As a result, Cytek reserves the right to supplement or amend its election based on additional discovery. Cytek further reserves the right to use non-elected prior art for any purposes other than for prior art invalidity, including for example, to provide a technical background and show the state of the art at the time of the alleged invention of any of the Asserted Patents, to show the understanding of a person of ordinary skill in the art at the time of the alleged invention of any of the Asserted Patents, for purposes of demonstrating motivations to combine and/or reasonable expectations of success, and/or to demonstrate the incremental value (if any) of the alleged inventions over the prior art for

determining damages.

Dated: November 25, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **CYTEK'S CORRECTED ELECTION OF ASSERTED PRIOR ART GROUNDS** was served to be served on the following persons by email on November 25, 2025:

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