

**UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

FENUN INC.,
Petitioner,
v.
PETPIVOT INC.,
Patent Owner.

Case No. PGR2026-_____
U.S. Patent No. 12,433,239 B2

**STIPULATION OF PETITIONER AND REAL PARTIES IN INTEREST
REGARDING THE PARALLEL DISTRICT COURT LITIGATION**

Petitioner FENUN Inc. (“Petitioner”) and its real parties in interest Shenzhen Yingqi Environmental Art Co., Ltd. (d/b/a FumoiShop) and Zhi Yang (collectively, the “Stipulating Parties”) submit this stipulation in connection with the Petition for Post-Grant Review of U.S. Patent No. 12,433,239 B2 (the “’239 patent”).

1. Patent Owner PetPivot Inc. has asserted the ’239 patent against Shenzhen Yingqi Environmental Art Co., Ltd. (d/b/a FumoiShop) and Zhi Yang in *PetPivot Inc. v. Shenzhen Yingqi Environmental Art Co., Ltd. (d/b/a FumoiShop) and Zhi Yang*, No. 8:26-cv-01554-VMC-TGW (M.D. Fla.) (the “District Court Litigation”).

2. Petitioner has filed a Petition requesting post-grant review of claims 1, 3, 4, and 6–18 of the ’239 patent.

3. The Stipulating Parties hereby stipulate that, if the Board institutes post-grant review of the ’239 patent based on the Petition, neither Petitioner nor its real parties

in interest Shenzhen Yingqi Environmental Art Co., Ltd. (d/b/a FumoiShop) and Zhi Yang will pursue in the District Court Litigation any ground of invalidity that was raised or reasonably could have been raised by Petitioner in this post-grant review proceeding.

4. This stipulation is co-extensive with the estoppel that would apply under 35 U.S.C. § 325(e)(2) and is intended to remove any overlap between the invalidity issues in this proceeding and the District Court Litigation. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020) (precedential as to § II.A).

5. Real parties in interest Shenzhen Yingqi Environmental Art Co., Ltd. (d/b/a FumoiShop) and Zhi Yang join this stipulation through their undersigned counsel and agree to be bound by it in the District Court Litigation. The defendants have not yet entered an appearance in that action; Petitioner and the real parties in interest will file or lodge this stipulation in the District Court Litigation promptly after their appearances are entered.

Dated: July 6, 2026

Respectfully submitted,

FOR PETITIONER

(counsel of record before the Board):

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