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VIA EMAIL

Bryan J. Jaketic
Squire Patton Boggs
4900 Key Tower 127 Public Square
Cleveland, OH 44114

RE: *Hy-Ko Products Company LLC v. The Hillman Group, Inc.*, No. 2:21-CV-00197-JRG: IPR stipulation

Dear Mr. Jaketic:

We write regarding the pending petitions for *inter partes* review filed by The Hillman Group (“Hillman”) against U.S. Patent Nos. 9,656,332, 10,421,133, 9,682,432, and 9,687,920. We write to inform you that Hillman hereby stipulates that Hillman will not pursue within the above-captioned litigation, 2:21-CV-00197-JRG, invalidity of any one of these patents on any ground that is instituted by the Patent Trial and Appeal Board (PTAB) in these proceedings.

While this stipulation applies to the grounds identified in the noted proceedings, those grounds are listed below for your convenience:

Patent Number	Claims	Ground
9,656,332	1, 2, 4, 8, 9, 10, 11, and 13	U.S. Patent No. 6,064,747 (“Wills”) (§ 102)
	1, 2, 4, 8, 9, 10, 11, and 13	U.S. Patent No. 6,064,747 (“Wills”) in view of <i>Speedypik</i> , The National Locksmith, July 2000 (§ 103)
10,421,133	1-6, 9-16, 18, 20, 21, 22, and 24	U.S. Patent No. 6,064,747 (“Wills”) (§ 102)
	1-6, 9-16, 18, 20, 21, 23, and 24	U.S. Patent No. 6,064,747 (“Wills”) in view of <i>Speedypik</i> , The National Locksmith, July 2000 (§ 103)

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	1-6, 11-16, 18, and 24	U.S. Patent No. 4,666,351 (“Marchal”) in view of <i>Speedypik</i> , The National Locksmith, July 2000 (§ 103)
	9, 10, 20, and 21	U.S. Patent No. 4,666,351 (“Marchal”), <i>Speedypik</i> , The National Locksmith, July 2000, and U.S. Patent No. 6,064,747 (“Wills”) (§ 103)
9,682,432	1, 3, 6-13, 15, 16-20, 22, 25 and 26	U.S. Patent No. 6,064,747 (“Wills”) in view of U.S. Patent No. 6,152,662 (“Titus”) (§ 103)
	2, 3, 18, 23, and 27	U.S. Patent No. 6,064,747 (“Wills”) in view of U.S. Patent No. 6,152,662 (“Titus”) in further view of <i>To Clone or Not To Clone: That Is The Question</i> , The National Locksmith, September 1999 (§ 103)
	24	U.S. Patent No. 6,064,747 (“Wills”) in view of U.S. Patent No. 6,152,662 (“Titus”) in further view of U.S. Patent No. 4,658,263 (“Urbanski”) (§ 103)
	1-3, 7, 13, 16, 18, 20, 22, 23, 26, and 27	<i>Speedypik</i> , The National Locksmith, July 2000 in view of <i>To Clone or Not To Clone: That Is The Question</i> , The National Locksmith, September 1999 (§ 103)
	19	<i>Speedypik</i> , The National Locksmith, July 2000 in view of <i>To Clone or Not To Clone: That Is The Question</i> , The National Locksmith, September 1999, in further view of U.S. Patent No. 6,152,662 (“Titus”) (§ 103)
	6, 8-12, 15, 17	<i>Speedypik</i> , The National Locksmith, July 2000 in view of <i>To Clone or Not To Clone: That Is The Question</i> , The National Locksmith, September 1999, in further view of U.S. Patent No. 6,064,747 (“Wills”) (§ 103)
	24	<i>Speedypik</i> , The National Locksmith, July 2000 in view of <i>To Clone or Not To Clone: That Is The Question</i> , The National Locksmith, September 1999, in further view of U.S. Patent No. 4,658,263 (“Urbanski”) (§ 103)
9,687,920	1-2, 4-9, 18-20, and 22-25	U.S. Patent No. 6,064,747 (“Wills”) (§ 102)
	1-2, 4-6, and 9	Silca Lector Pro Manual (§ 102)
	10-12 and 17	U.S. Patent No. 4,899,391 (“Cimino”) (§ 102)
	14 and 15	U.S. Patent No. 4,899,391 (“Cimino”) in view of U.S. Patent No. 6,064,747 (“Wills”) (§ 103)

	10-12, 14, and 17	<i>Speedypik</i> , The National Locksmith, July 2000 (“Speedypik Article”) (§ 102)
	15	<i>Speedypik</i> , The National Locksmith, July 2000 (“Speedypik Article”) in view of U.S. Patent No. 6,064,747 (“Wills”) (§ 103)
	18-20, 22-23, and 25	European Patent EP0053730B1 (“Schmalfuss”) (§ 102)
	18-20 and 22-25	U.S. Patent No. 6,064,747 (“Wills”) in view of European Patent EP0053730B1 (“Schmalfuss”) (§ 103)
	18-20 and 22-24	Silca Lector Pro Manual in view of European Patent EP0053730B1 (“Schmalfuss”) (§ 103)

In so stipulating, Hillman seeks to avoid multiple proceedings addressing the validity of the patents-in-suit based on the exact same grounds. Rather, consistent with Congressional intent, through this stipulation, Hillman expresses its intention to have only the PTAB address the patentability of these patents in view of the specific grounds identified above. For the sake of clarity and to avoid any doubt, if the PTAB denies institution of one or more petitions for *inter partes* review, Hillman reserves the right to pursue the grounds of those petitions in this litigation. Additionally, Hillman reserves its rights to continue to assert all other grounds in the litigation, whether based on the same references or related references to those listed above.

Feel free to give me a call if you would like to discuss.

Best regards,

/s/ Kevin Schubert

Kevin Schubert