UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner,

v.

APEX BEAM TECHNOLOGIES LLC,
Patent Owner.

Case IPR2023-00571
Patent No. 10,951,271

PETITIONER'S *SOTERA* STIPULATION

Consistent with *Sotera Wireless, Inc*., Petitioner hereby stipulates "that, if the PTAB institutes *inter partes* review, Petitioner 'will not pursue in [*Apex Beam Technologies LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 2:22-cv-00188-JRG (E.D. Tex.) (consolidated with *Apex Beam Technologies LLC v. ZTE Corporation*, Case No. 2:22-cv-00031-JRG-RSP (E.D. Tex.))] the specific grounds [asserted in IPR2023-00571], or . . . any other ground . . . that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications).'" *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential as to § II.A).

Dated: September 6, 2023

/Joshua L. Goldberg/
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