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| **From:** | Bob Hansen |
| **To:** | Trials |
| **Cc:** | beutermoser@kslaw.com; rblythe@kslaw.com; mikaela.stone@kslaw.com; Scott B. Amankwatia; Matthew Anderson |
| **Subject:** | IPR2023-00662 - Request for permission to file a Sotera Stipulation |
| **Date:** | Thursday, September 21, 2023 5:22:41 PM |
| **Attachments:** | DRAFT Sotera Stipulation for IPR2023-00662 ("844 Patent).pdf |

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Dear Board,

I am writing as lead counsel for Petitioner Trend Micro, Inc. in IPR2023-00662 (regarding U.S. Patent No. 10,599,844), filed March 3, 2023. We seek the Board's permission to submit a *Sotera* stipulation to be considered as part of the filed Petition.

We believe that this stipulation will not unduly prejudice the patent owner because the stipulation limits the scope of grounds that Petitioner will raise in the parallel District Court proceedings. If the *Sotera* stipulations are entered it will mitigate concerns of potentially conflicting decisions and duplicative efforts between the District Court and the Board. We believe the *Sotera* stipulation should be entered at this time because the Board has not made an institution decision.

Therefore, Petitioner requests permission to submit a *Sotera* stipulation as presented on the attached draft submission.

Thank you for considering this request. We will await your guidance and instructions.

Best Regards,
Bob Hansen
Reg. No. 43,656
Lead Counsel for Petitioner, Trend Micro, Inc.

**Robert M. Hansen, Esq.**

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