

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
Including Professional Corporations

STEVEN G. SCHORTGEN, (*pro hac vice*)
sschortgen@sheppardmullin.com
JENNIFER K. AYERS, (*pro hac vice*)
jayers@sheppardmullin.com
2200 Ross Avenue, 20th Floor
Dallas, Texas 75201
Telephone: 469.391.7400
Facsimile: 469.391.7401

DARREN M. FRANKLIN, Cal. Bar No. 210939
dfranklin@sheppardmullin.com
333 South Hope Street, 43rd Floor
Los Angeles, California 90071-1422
Telephone: 213.620.1780
Facsimile: 213.620.1398

DANIEL N. YANNUZZI, Cal. Bar No. 196612
dyannuzzi@sheppardmullin.com
ERIC K. GILL, Cal. Bar No. 292548
egill@sheppardmullin.com
DOMINIQUE E. COMBS, Cal. Bar No. 299742
dcombs@sheppardmullin.com
SAMANTHA A. YOUNG, Cal. Bar No. 340318
syoun@sheppardmullin.com
12275 El Camino Real, Suite 100
San Diego, California, 92130-4092
Telephone: 858.720.8900
Facsimile: 858.509.3691

Attorneys for Defendant and Counterclaimant
SNAP INC.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

PLAYVUU, INC.,
Plaintiff,

v.

SNAP INC.,
Defendant.

Case No. 2:22-cv-06019-GW-PDx

**DEFENDANT/
COUNTERCLAIMANT SNAP
INC.'S *SOTERA* STIPULATION**

The Hon. George H. Wu
Ctrm.: 9D

Trial Date: August 13, 2024

AND RELATED COUNTERCLAIM.

On or about May 26, 2023, Defendant/Counterclaimant Snap Inc. (“Snap”) will file petition number IPR2023-00848 with the Patent Trial and Appeal Board (“the Board”) requesting *inter parties* review (“IPR”) of all of the claims of U.S. Patent No. 10,931,911 (the “’911 patent”), asserting the following grounds of invalidity:

Grounds	Claims	Statutory Basis	Prior Art
1	1-10	§ 103	<i>Cohen</i> (U.S. Patent Pub. No. 2009/0164034A1) in view of <i>Chu</i> (U.S. Patent No. 6,086,380), <i>Sherman</i> (U.S. Patent Pub. No. 2003/0164924), and <i>Joslin</i> (U.S. Patent No. 7,324,166)
2	11	§ 103	<i>Cohen</i> in view of <i>Chu</i> , <i>Sherman</i> , <i>Joslin</i> , and <i>Lei</i> (U.S. Patent Pub. No. 2008/0285859)
3	1-10	§ 103	<i>Cohen</i> in view of <i>Chu</i> , <i>Sherman</i> , <i>Joslin</i> , and <i>Austerberry</i> (<u>The Technology of Video and Audio Streaming</u> , David Austerberry, Focal Press, 2002)
4	11	§ 103	<i>Cohen</i> in view of <i>Chu</i> , <i>Sherman</i> , <i>Joslin</i> , <i>Lei</i> , and <i>Austerberry</i>

Snap hereby stipulates that, if the Board institutes IPR2023-00848 for the ’911 patent, then, for any originally issued claim(s) of the ’911 patent for which IPR is instituted, Snap will not pursue in this case the specific grounds identified above in connection with such claim(s), or any other ground as to such claim(s) that could have been reasonably raised in the IPR.

This stipulation is not intended, and should not be construed, to limit Snap’s ability to assert invalidity of any of the claims of the ’911 patent in this case on any other ground that could not have reasonably been raised in the IPR, regardless of whether IPR is instituted.

1 Dated: May 26, 2023
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4 By

/s/ Jennifer K. Ayers

JENNIFER K. AYERS

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7 Attorneys for Defendant and Counterclaimant
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