

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

**LG ELECTRONICS INC.,**

Petitioner,

**v.**

**PANTECH WIRELESS, LLC,**

Patent Owner.

---

Case IPR2023-01270

U.S. Patent No. 10,869,247

---

**PETITIONER'S OFFERED SOTERA STIPULATION**

**PETITIONER'S OFFERED SOTERA STIPULATION**

Consistent with *Sotera*, Petitioner hereby stipulates that, if the PTAB institutes this IPR, Petitioner will not pursue in *Pantech Corp. v. LG Elecs. Inc.*, No. 5:22-cv-00113 (E.D. Tex.), the grounds of invalidity asserted in the IPR, or any other ground that was raised or could have reasonably been raised in the IPR. *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Pap. 12, \*13-14.

Date: February 21, 2024

Respectfully submitted

By: /James L. Davis, Jr./  
James L. Davis, Jr.  
Reg. No. 57,325  
*Counsel for Petitioner*