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Subject: PR2024-00005 - Petitioner's Sotera Stipulation
Date: Friday, January 26, 2024 7:26:35 AM

Counsel,

It appears from the 1/19/2024 POPR there may have been confusion about Petitioner's stipulation at page 99 of the Petition. Petitioner intended the stipulation in the Petition to have the effect of a Sotera stipulation without any limitations.

For the avoidance of doubt, in accordance with the Board's precedential decision in Sotera Wireless, Inc. v. Masimo Corp., IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020), Ensign US Southern Drilling LLC agrees that if IPR2024-00005 is instituted, Ensign US Southern Drilling LLC will not pursue "any ground that [Ensign US Southern Drilling LLC] raised or reasonably could have raised" during IPR2024-00005 in the related district court proceeding, C&M Oilfield Rentals, LLC D/B/A C-Mor Energy Services v. Ensign US Southern Drilling LLC, Civil Action No. 4:22-cv-00965, Southern District of Texas, Houston Division (served April 1, 2022; amended complaint raising '626 Patent served March 30, 2023).

Regards,
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