

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HILTI AKTIENGESELLSCHAFT,

Plaintiff, Counterclaim
Defendant

C.A. No. 22-1248-CJB

v.

SPECIFIED TECHNOLOGIES INC.,

Defendant, Counterclaimant.

SOTERA STIPULATION

WHEREAS, Hilti Aktiengesellschaft (“Hilti”) is filing, or has filed, a Petition for *Inter Partes* Review directed to U.S. Patent No. 9,157,232 in IPR2024-00192 (the “’232 Patent Petition”); and

WHEREAS, this so-called *Sotera* stipulation, served on Patent Owner Specified Technologies, Inc., is consistent with Director Vidal’s Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings With Parallel District Court Litigation dated June 21, 2022.

NOW THEREFORE, Hilti hereby stipulates as follows:

If the Patent Trial and Appeal Board (the “PTAB”) institutes the ’232 Patent Petition, then Hilti will not pursue in this Court the grounds included in the ’232 Patent Petition or any other ground that could have reasonably been raised before

the PTAB in the '232 Patent Petition (*i.e.*, any ground that could be reasonably raised under §§102 or 103 on the basis of prior art patents or printed publications).

Dated: November 17, 2023

**YOUNG CONAWAY STARGATT
& TAYLOR, LLP**

/s/ Pilar G. Kraman

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