IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HILTI AKTIENGESELLSCHAFT, Plaintiff, Counterclaim Defendant v. SPECIFIED TECHNOLOGIES INC., Defendant, Counterclaimant.	C.A. No. 22-1248-CJB

***SOTERA* STIPULATION**

WHEREAS, Hilti Aktiengesellschaft ("Hilti") is filing, or has filed, a Petition for *Inter Partes* directed to U.S. Patent No. 10,143,868 in IPR2024-00193 (the "'868 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 '868 Patent Petition, then Hilti will not pursue, in this Court, the grounds included in the '868 Patent Petition or any other ground that could have reasonably been raised before

the PTAB, in the '868 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
Pilar G. Kraman (No. 5199)
Alexis N. Stombaugh (No. 6702)
Rodney Square
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
pkraman@ycst.com
astombaugh@ycst.com

Attorneys for Plaintiff
Hilti Aktiengesellschaft

GARDELLA GRACE P.A.

/s/ W. Cook Alciati
W. Cook Alciati
Michael A. Dorfman
80 M Street SE, 1st Floor
Washington DC 2003
calciati@gardellagrace.com
mdorfman@gardellagrace.com