

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

MULTIMEDIA TECHNOLOGIES PTE.
LTD.,

Plaintiff,

v.

LG ELECTRONICS INC. AND LG
ELECTRONICS USA, INC.,

Defendants.

Case No. 2:22-CV-00494-JRG-RSP

JURY TRIAL DEMANDED

**NOTICE OF SOTERA STIPULATION OF
DEFENDANTS LG ELECTRONICS INC. AND LG ELECTRONICS USA, INC.**

On December 20, 21, and 22, 2023, Defendant LG Electronics Inc. and LG Electronics USA, Inc. (collectively, “LG” or “Defendants”) filed petitions for *Inter Partes* Review (“IPR”) of some of the asserted patents in this lawsuit – IPR2024-00351, IPR2024-00352, IPR2024-00353, and IPR2024-00354 – with the Patent Trial and Appeal Board of the United States Patent and Trademark Office (the “PTAB”). Both Defendants were named as Petitioners and as real parties-in-interest in each IPR proceeding. The table below indicates the IPR number, challenged patent number, and challenged claims of the respective petitions filed before the PTAB:

IPR No.	Asserted U.S. Patent No.	Challenged Claims
IPR2024-00351	9,510,040	1-6, 11-16, and 21-22
IPR2024-00352	9,247,174	1-14
IPR2024-00353	9,055,254	1-4, 6, 8-10, 12-17, and 19
IPR2024-00354	10,419,805	1-18

The claims challenged in these IPR petitions include all the claims of the above respective asserted patents that Plaintiff Multimedia Technologies Pte. Ltd. (“Multimedia” or “Plaintiff”)

has asserted against Defendants in this litigation.¹

Defendants hereby notify the Court and Plaintiff that Defendants are submitting the following “*Sotera* stipulations” in support of the petitions in IPR2024-00351, IPR2024-00352, IPR2024-00353, and IPR2024-00354. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (PTAB Dec. 1, 2020) (“*Sotera*”).

Defendants hereby stipulate, consistent with the stipulation made by the Petitioner in *Sotera* that, if the PTAB institutes an IPR in response to Defendants’ petition against Plaintiff’s U.S. Patent No. 9,510,040 (IPR2024-00351), Defendants will not pursue in this litigation the grounds raised or any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (*i.e.*, any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications).

Defendants hereby stipulate, consistent with the stipulation made by the Petitioner in *Sotera* that, if the PTAB institutes an IPR in response to Defendants’ petition against Plaintiff’s U.S. Patent No. 9,247,174 (IPR2024-00352), Defendants will not pursue in this litigation the grounds raised or any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (*i.e.*, any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications).

Defendants hereby stipulate, consistent with the stipulation made by the Petitioner in *Sotera* that, if the PTAB institutes an IPR in response to Defendants’ petition against Plaintiff’s U.S. Patent No. 9,055,254 (IPR2024-00353), Defendants will not pursue in this litigation the grounds raised or any other grounds that could have reasonably been raised before the PTAB in

¹ Plaintiff asserts seven other patents in this lawsuit that are not subject to the above IPR petitions filed by Defendants.

that instituted proceeding (*i.e.*, any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications).

Defendants hereby stipulate, consistent with the stipulation made by the Petitioner in *Sotera* that, if the PTAB institutes an IPR in response to Defendants' petition against Plaintiff's U.S. Patent No. 10,419,805 (IPR2024-00354), Defendants will not pursue in this litigation the grounds raised or any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (*i.e.*, any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications).

Defendants' *Sotera* stipulations above are not intended and should not be construed to limit Defendants' ability to assert invalidity of any claims of the patents-at-issue in this lawsuit based on any other ground.

Dated: April 19, 2024

Respectfully submitted,

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*Admitted to practice

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system per Local Rule CV-5(a)(3) this April 19, 2024.

/s/ Collin W. Park

Collin W. Park