

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

ISIX IP LLC,

Plaintiff,

v.

SAP AMERICA, INC.,

Defendants.

CASE NO. 2:23-cv-00237-JRG

SAP’S STIPULATION OF INVALIDITY CONTENTIONS

Defendant SAP America Inc. (“SAP”) submits this stipulation of invalidity contentions.

On February 26, 2024, SAP filed petition IPR2024-00615 with the Patent Trial and Appeal Board (“PTAB”) requesting inter partes review of U.S. Patent No. 6,308,178.

The Petition asserts the following grounds of invalidity:

IPR Ground	Claims	Grounds of Unpatentability
1	1, 3, 4, 7, 8	35 U.S.C. § 103 over U.S. Patent No. 5,842,205 to Brann (“Brann”)
2	1-5, 7, 9, 10, 23-25	35 U.S.C. § 103 over U.S. Patent No. 6,208,990 to Suresh et al. (“Suresh”)
3	1-5, 7, 9, 10, 23-25	35 U.S.C. § 103 over Suresh in view of Brann
4	8, 19	35 U.S.C. § 103 over Suresh in view of U.S. Patent No. 6,621,505 to Beauchamp et al. (“Beauchamp”)
5	8, 19	35 U.S.C. § 103 over Suresh in view of Brann and Beauchamp

SAP hereby stipulates that if the PTAB institutes IPR on IPR2024-00615, then SAP will not pursue in this litigation the grounds raised in that petition for IPR, or any other ground that

was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patents or printed publications). *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12, at 18-19 (PTAB Dec. 1, 2020).

Date: draft

Respectfully submitted,

By: /s/  xxdraft

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document is being served on all counsel of record via electronic mail this xxth day of July, 2024.

/s/ xx
xx
