UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners

v.

MAXELL, LTD.,
Patent Owner

Inter Partes Review No.: IPR2024-00867

U.S. Patent No. 10,176,848

PETITIONERS' *SOTERA* STIPULATION

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), Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (Petitioners) stipulate that if the Board institutes *inter partes* review in this proceeding, IPR2024-00867, then Petitioners will not pursue in the parallel district court proceeding, *Maxell Ltd. v. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.*, Case No. 5:23-cv-00092-RWS, the same grounds as in the petition or any grounds that could have reasonably been raised in the petition. The Board authorized this filing in its September 10, 2024 email to the parties (EX3001).

Date: September 12, 2024

Respectfully submitted,

/s/ Gianni Minutoli

Gianni Minutoli
Reg. No. 41198
DLA Piper LLP
One Fountain Square
11911 Freedom Drive, Suite 300
Reston, VA 20190-5602
Phone: + 1 703 773 4000
Fax: + 1 703 773 5000
Gianni.minutoli@us.dlapiper.com

James Heintz
Reg. No. 41828
DLA Piper LLP
One Fountain Square
11911 Freedom Drive, Suite 300
Reston, VA 20190-5602
Phone: + 1 703 773 4000

Fax: + 1 703 773 5000
jim.heintz@us.dlapiper.com

Attorneys for Petitioners

CERTIFICATE OF SERVICE

The undersigned certifies that on September 12, 2024, a true and correct copy of the Petitioners' *Sotera* Stipulation was served by emailing a copy of same (by agreement) to the following attorneys for the Patent Owner:

rpluta@mayerbrown.com

maxell-samsung-service@mayerbrown.com

Date: September 12, 2024

/s/ Gianni Minutoli

Gianni Minutoli
Reg. No. 41198
DLA Piper LLP
One Fountain Square
11911 Freedom Drive, Suite 300
Reston, VA 20190-5602
Phone: + 1 703 773 4000
Fax: + 1 703 773 5000
Gianni.minutoli@us.dlapiper.com

Attorney for Petitioners