From:	Scott.McKeown@WolfGreenfield.com
To:	Tom Dunham
Cc:	SMcKeown-PTAB@WolfGreenfield.com; AWichman-PTAB@WolfGreenfield.com; Elizabeth O"Brien; Robert Molitors; RPritzker-PTAB@WolfGreenfield.com
Subject:	IPR2024-00923; IPR2024-00924; IPR2024-00925; and IPR2024-01046 (Sony Corp v. Optimum Imaging Technologies)
Date:	Wednesday, September 4, 2024 5:53:11 PM
Attachments:	image001.png image002.png image003.png

Counsel,

In accordance with the USPTO's Director Memorandum of June 21, 2022 entitled: "Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation" (citing the precedential decision in *Sotera Wireless, Inc. v. Masimo Corp., IPR2020-01019*, Paper 12 at 18-19 (PTAB Dec. 1, 2020)), Sony Corporation (Sony) hereby stipulates that if IPR Nos. IPR2024-00923-00925, & 01046 are instituted, Sony will not pursue "any ground that [Sony] raised or reasonably could have raised" during the IPRs in the related district court proceeding, *Optimum Imaging Technologies LLC v. Sony Corporation*, 4:23-cv-00928 (EDTX). 35 U.S.C. § 315(d).

Scott McKeown (Mik-Q-En)
Shareholder
Scott.McKeown@wolfgreenfield.com
202.389.6025

Wolf, Greenfield & Sacks, P.C.
BOSTON | NEW YORK | WASHINGTON DC
wolfgreenfield.com

This e-mail message and any attachments may contain confidential or privileged information. If you are not the intended recipient, please notify me immediately by replying to this message. Please destroy all copies of this message and any attachments. Thank you.