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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](#)
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[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).



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