

Filed: November 25, 2024

Filed on behalf of: Aylo Freesites Ltd

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AYLO FREESITES LTD,
Petitioner

v.

WELLCOMEMAT, LLC,
Patent Owner

IPR2024-01101
U.S. Patent No. 8,307,286

PETITIONER'S *SOTERA* STIPULATION¹

¹ This Stipulation was authorized by the Board in an email dated November 22, 2024. Ex. 3001.

In accordance with the precedential decision in *Sotera Wireless, Inc. v. Masimo Corp.*, IPR202-01019, Paper 12 (PTAB Dec. 1, 2020) (precedential), Aylo Freesites Ltd (“Petitioner”) hereby agrees and stipulates that if IPR2024-01101, which challenges claim 17 of U.S. Patent No. 8,307,286, is instituted, Petitioner and its real parties-in-interest will not pursue in the related district court proceeding where Petitioner is a defendant (*WellcomeMat, LLC v. Aylo Holdings Sarl et al.*, No. 2:23-cv-00483-JRG (E.D. Tex.)) an invalidity challenge of claim 17 based on “any ground that [Petitioner] raised or reasonably could have raised during that inter partes review” against claim 17. 35 U.S.C. § 315(e).

DATED: November 25, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this date, true and correct copies of the foregoing
Petitioner's *Sotera* Stipulation were served via electronic service by email at the
following addresses:

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