Paper No. 8
Filed: January 29, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., and
SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioner,

v.

HARBOR ISLAND DYNAMIC, LLC,
Patent Owner.

Case IPR2024-01405
U.S. Patent No. 9,245,826

PETITIONER'S *SOTERA* STIPULATION

Consistent with *Sotera Wireless, Inc.*, Petitioner hereby stipulates "that if the PTAB institutes *inter partes* review, Petitioner 'will not pursue in [*Harbor Island Dynamic, LLC v. Samsung Electronics Co. Ltd. et al.*, 2:24-cv-00140 (EDTX)] the specific grounds [asserted in IPR2024-01405], 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 patent or printed publications).'" *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential as to § II.A.).

Respectfully submitted,

Dated: January 29, 2025 By: /Joshua L. Goldberg/
Joshua L. Goldberg, Reg. No. 59,369
Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Petitioner's *Sotera* Stipulation** was served electronically via email on January 29, 2025, in its entirety on the following:

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Patent Owner has consented to service by email.

Dated: January 29, 2025

/William Esper/
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