

From: [Trials](#)
To: [Haber, Ben](#); [Trials](#)
Cc: [James Tsuei](#); [Peter Tong](#); bwang@raklaw.com; aweiss@raklaw.com; rak_cerence@raklaw.com; [Reidy, Patrick C.](#); [Clark, Douglas](#); [Boardman, Albert](#); [xSamsung Cerence AP](#); [Sharifahmadian, Ali R.](#); [Fink, Tim](#); [#OMM-Cerence-Samsung](#)
Subject: RE: IPR2024-01464 and IPR2024-01465 - Requests for authorization to file Sotera stipulations for the record
Date: Thursday, March 6, 2025 1:32:55 PM

Counsel –

On February 10, 2025, Petitioners sought authorization from the Board to file, as an exhibit in each of IPR2024-01464 and IPR2024-01465, a copy of a letter that Co-Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“the Samsung Co-Petitioners”) sent to Patent Owner containing a Sotera-type prior art stipulation related to the co-pending district court Case No. 2:23-cv-00482-JRG-RSP, in which each of the subject patents is asserted in the Eastern District of Texas. Petitioners indicate that the request is unopposed.

Petitioners’ unopposed request is hereby granted.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

From: Haber, Ben <bhaber@omm.com>
Sent: Wednesday, March 5, 2025 10:36 AM
To: Trials <Trials@USPTO.GOV>
Cc: James Tsuei <jtsuei@raklaw.com>; Peter Tong <ptong@raklaw.com>; bwang@raklaw.com; aweiss@raklaw.com; rak_cerence@raklaw.com; Reidy, Patrick C. <Patrick.Reidy@arnoldporter.com>; Clark, Douglas <Douglas.Clark@arnoldporter.com>; Boardman, Albert <Albert.Boardman@arnoldporter.com>; xSamsung Cerence AP <xSamsungCerenceAP@arnoldporter.com>; Sharifahmadian, Ali R. <Ali.Sharifahmadian@arnoldporter.com>; Fink, Tim <tfink@omm.com>; #OMM-Cerence-Samsung <OMM-Cerence-Samsung@omm.com>
Subject: RE: IPR2024-01464 and IPR2024-01465 - Requests for authorization to file Sotera stipulations for the record

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Dear Honorable Board,

We have not yet received a response on the below request to submit *Sotera* stipulations into the record. Can you please let us know if you need anything further on this request?

Thank you,
Ben Haber
Counsel for Petitioners

From: Haber, Ben

Sent: Monday, February 10, 2025 11:37 AM

To: Trials <Trials@USPTO.GOV>

Cc: James Tsuei <jtsuei@raklaw.com>; Peter Tong <ptong@raklaw.com>; bwang@raklaw.com; aweiss@raklaw.com; rak_cerence@raklaw.com; Reidy, Patrick C. <Patrick.Reidy@arnoldporter.com>; Clark, Douglas <Douglas.Clark@arnoldporter.com>; Boardman, Albert <Albert.Boardman@arnoldporter.com>; xSamsung Cerence AP <xSamsungCerenceAP@arnoldporter.com>; Sharifahmadian, Ali R. <Ali.Sharifahmadian@arnoldporter.com>; Fink, Tim <TFink@omm.com>; #OMM-Cerence-Samsung <OMM-Cerence-Samsung@omm.com>

Subject: IPR2024-01464 and IPR2024-01465 - Requests for authorization to file *Sotera* stipulations for the record

Dear Honorable Board,

Petitioners respectfully seek authorization to file, as an exhibit in each of IPR2024-01464 and IPR2024-01465, a copy of a letter that Co-Petitioners Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“the Samsung Co-Petitioners”) sent to Patent Owner containing a *Sotera*-type prior art stipulation related to the co-pending district court Case No. 2:23-cv-00482-JRG-RSP, in which each of the subject patents is asserted in the Eastern District of Texas. Patent Owner has argued in its POPRs that the petitions should be discretionarily denied under *Fintiv*. The stipulations specify that for each of the above petitions, if the PTAB institutes review, the Samsung Co-Petitioners will not pursue in district court any ground of invalidity raised or that could have been reasonably raised in the corresponding IPR. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 16-19 (PTAB Dec. 1, 2020).

For the sake of clarity, Co-Petitioner Google, Inc. is not a party to the pending, parallel district court litigation and is not a party to the stipulation.

Counsel for Patent Owner is copied on this request, and does not oppose it.

Should the Board require a conference call, the parties will confer and provide times of mutual availability.

Sincerely,
Ben Haber
Counsel for Petitioners