From: Roy Chamcharas
Sent: Tuesday, January 14, 2025 4:32 PM
To: Hannah, James; Fuller, Jenna; Kastens, Kris; Price, Jeffrey H.; Keller, Charles; svdocketing@kramerlevin.com
Cc: Andrew M. Mason; Todd M. Siegel; Samuel Thacker; Shelby A. Stepper; SAP_Cyandia_IPRs
Subject: SAP AMERICA, INC. v. CYANDIA, INC. - IPR2024-01432, -01433, -01495, and -01496 - Sotera-type stipulation

Counsel,

SAP stipulates that, should IPR be instituted in IPR2024-01432, 2024-01433, 2024-01495, or 2024-01496, SAP will not pursue in the E.D. Tex. district court litigation any ground of unpatentability that is raised or reasonably could have been raised in any instituted IPR.

Thank you,

Roy

Klarquist

Roy Chamcharas | Partner
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SAP EXHIBIT 1045
SAP America, Inc. v. Cyandia, Inc.
IPR2024-01495