UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner,

v.

WSOU INVESTMENTS d/b/a
BRAZOS LICENSING AND DEVELOPMENT,
Patent Owner.

IPR2025-00188
U.S. Patent No. 8,982,691

PETITIONER'S AUTHORIZED *SOTERA* STIPULATION

Petitioner Cisco Systems, Inc. stipulates as follows pursuant to the Board's authorizing email dated March 31, 2025:

> If the Board institutes an IPR trial in IPR2025-00188, Petitioner Cisco Systems, Inc. hereby stipulates that Petitioner will not pursue in the co-pending district court litigation (*WSOU Investments, LLC v. Cisco Systems, Inc.*, No. 2:24-cv-00332 (E.D. Tex.)) the specific grounds asserted in the IPR2025-00188 petition, or any other ground that could have been reasonably raised against Challenged Claims 1 through 10 of U.S. Patent No. 8982691 in an IPR (i.e., grounds that could have been raised under §§102 or 103 on the basis of prior art patent or printed publications). See *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-00109, Paper 12 at 18–19 (Dec. 1, 2020).

Notwithstanding this stipulation, Petitioner does not relinquish any rights or opportunities to pursue in the co-pending district court litigation (*WSOU Investments, LLC v. Cisco Systems, Inc.*, No. 2:24-cv-00332 (E.D. Tex.)) any ground on which the PTAB declines to institute an IPR trial. Petitioner also does not relinquish any rights or opportunities to challenge the '691 patent claims on any other ground (i.e., any ground that could not have been raised under §§ 102 or 103 on the basis of prior art patent or printed publications).

Dated: April 1, 2025

/Theodore M. Foster/
Theodore M. Foster
Lead Counsel for Petitioner
Registration No. 57,456

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CERTIFICATE OF SERVICE

The undersigned certifies that, in accordance with 37 C.F.R. § 42.6(e), service was made on Patent Owner as detailed below.

Date of service	April 1, 2025
Manner of service	Electronic Service: david.schumann@foliolaw.com; timothy.dewberry@foliolaw.com
Documents served	**Petitioner's Authorized *Sotera* Stipulation**
Persons served	David D. Schumann Timothy Dewberry Folio Law Group PLLC 1200 Westlake Ave. N., Ste. 809 Seattle, WA 98109

/Theodore M. Foster/
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Lead Counsel for Petitioner
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