UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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

v.

SINOTECHNIX LLC.
Patent Owner

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Case No. IPR2025-00331
U.S. Patent No. 7,618,162

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# PETITIONER'S UPDATED *SOTERA* STIPULATION

Consistent with *Sotera Wireless, Inc*., Petitioner hereby stipulates "that if the PTAB institutes *inter partes* review, Petitioner 'will not pursue in [*Sinotechnix LLC v. Samsung Electronics Co., Ltd. et al.,* No. 2:24-cv-00544 (EDTX) ("Litigation")] the specific grounds [asserted in IPR2025-00331], 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). For the avoidance of doubt, if the PTAB institutes *inter partes* review, Petitioner will not, in the Litigation, rely on any product or system art that is "based on the same evidence presented" in this IPR. *Cf. SAP America, Inc. v Cyandia, Inc.*, IPR2024-01496, Paper 13 at 9 (PTAB Apr. 7, 2025). Further, if the PTAB institutes inter partes review, Petitioner will not, in the Litigation, "assert combinations of product art with printed publication prior art asserted in this [IPR] proceeding." *Samsung Elecs. Co., Ltd. v. SiOnyx, LLC*, IPR2025-00064, Paper 16 at 14 (PTAB Jun. 6, 2025).

Respectfully submitted,

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