

From: [Director Discretionary Decision](#)
To: [Taeg Sang \(Tim\) Cho](#)
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Subject: RE: IPR2025-00334
Date: Monday, May 12, 2025 3:26:03 PM

Counsel – Petitioner’s unopposed request is granted and Petitioner is authorized to file an updated stipulation as an exhibit.

From: Taeg Sang (Tim) Cho <TCho@desmaraisllp.com>
Sent: Friday, May 9, 2025 5:47 PM
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Subject: IPR2025-00334

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Case No.: IPR2025-00334

Dear Honorable Board,

Petitioner requests the Board’s permission to submit as an exhibit an updated *Sotera* stipulation in IPR2025-00334 (regarding Patent No. 9,412,913) in light of the Federal Circuit’s recent decision in *Ingenico Inc. v. IOENGINE, LLC*, No. 23-1367 (Fed. Cir. May 7, 2025) to make clear that the stipulation includes the portions bolded and italicized below. The following language is consistent with the stipulations already filed in IPR2025-00331, -00332, -00333, -00335, and -00336.

- 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 IPR2025-00334], 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).

Patent Owner's counsel (whose appearance is being verified) does **not** oppose this request.

Should a call be needed, the parties will make themselves available at the Board's convenience.

Best regards,
Taeg Sang Cho

Taeg Sang (Tim) Cho | Partner

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