UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

SINOTECHNIX LLC.
Patent Owner

Case No. IPR2025-00334
U.S. Patent No. 9,412,913

PETITIONER'S *SOTERA* STIPULATION

I. Introduction

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).

Dated: May 12, 2025

Respectfully submitted,

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