

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAP AMERICA, INC. AND SAP SE
Petitioners,

v.

VALTRUS INNOVATIONS LTD. AND KEY PATENT INNOVATIONS LTD.
Patent Owner.

Case No. IPR2025-00417
U.S. Patent No. 6,823,409

EXHIBIT 1021
SAP'S STIPULATION REGARDING INVALIDITY
ASSERTIONS IN PARALLEL PROCEEDING

Petitioners SAP America, Inc. and SAP SE (collectively “SAP”) hereby stipulate that if the PTAB institutes *inter partes* review of U.S. Patent 6,823,409 (the “409 patent”) in this proceeding, SAP will not pursue, against the 409 patent in the parallel district court proceedings,¹ the specific grounds asserted in this *inter partes* review or any other ground that could have been raised in this *inter partes* review.

Dated: May 6, 2025

Respectfully submitted,

/ Louis L. Campbell /

Louis L. Campbell (Lead Counsel)

llcampbell@winston.com

USPTO Reg. No. 59,963

Winston & Strawn LLP

255 Shoreline Dr., Ste. 520

Redwood City, CA 94065

T: (650) 858-6500, F: (650) 858-6550

Lead Counsel for Petitioners

¹ *Valtrus Innovations Ltd. v. SAP America, Inc. et al*, 2:24-cv-00021-JRG (E.D. Tex.), *Valtrus Innovations Ltd. v. SAP America, Inc. et al*, 2:24-cv-00533 (E.D. Tex.), and *SAP America, Inc. v. Valtrus Innovations Limited et al*, 1:24-cv-00756-GBW (D. Del.).