

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioners

v.

STERLING COMPUTERS CORPORATION,
Patent Owner.

IPR2025-00430

U.S. Patent No. 7,716,217

JOINT STIPULATION REGARDING DISCOVERY

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Petitioner Meta Platforms, Inc. (“Meta”) and Patent Owner Sterling Computers Corp. (“Sterling”) submit the following stipulation related to discovery surrounding EX-2042 and EX-2046.

WHEREAS X Corp. f/k/a Twitter, Inc. (“X”) has filed its own IPR challenging certain claims of U.S. Patent No. 7,716,217 as obvious in IPR2025-299;

WHEREAS Sterling filed a Patent Owner Response in IPR2025-299 that relies on a Second Supplemental Declaration of Justin Marston (EX-2030), which in turn relies on a partially-redacted document (EX-2046) and a privilege log (EX-2042) to support its arguments;

WHEREAS X filed a motion for routine discovery on November 13, 2025 to compel Sterling to produce an unredacted version of EX-2046 and the documents listed on EX-2042;

WHEREAS on December 9, 2025, the Board granted in part and denied in part X’s request, ordering Sterling to produce an unredacted version of EX-2046, but denying X’s request as to the documents listed on EX-2042;

WHEREAS Sterling’s Patent Owner Response in IPR2025-430 relies on a similar Second Supplemental Declaration of Justin Marston (EX-2030), which also

relies on a partially-redacted document (EX-2046) and a privilege log (EX-2042) for the same purpose in IPR2025-430 as in IPR2025-299;

WHEREAS EX-2042 and EX-2046 have substantially the same content in both IPR2025-00299 and IPR2025-00430;

WHEREAS on December 16, 2025, Meta requested permission to file a motion for routine or additional discovery under 37 CFR § 42.51(b) and/or a request to file a motion to compel production under 37 CFR § 42.52 seeking production of the documents listed on EX-2042 and an unredacted version of EX-2046, which Sterling opposed on the basis that the Board had already ruled on the issues, and Sterling offered to stipulate that both parties be bound to the Order in the X IPR but that both parties preserve all rights to appeal;

WHEREAS on December 18, 2025, the Board did not grant Meta's request and directed the parties to instead provide a stipulation to be bound by the Board's Order on Routine and Additional Discovery in IPR2025-00299, Paper 31 ("Order");

WHEREAS Petitioner seeks to preserve the ability on appeal to challenge that the documents listed on EX-2042 should be produced as non-privileged, and Patent Owner seeks to preserve the ability on appeal to challenge that the redactions to EX-2046 are privileged;

Sterling and Meta stipulate that the Order applies equally in IPR2025-00430 as in IPR2025-00299. Pursuant to that Order, Sterling will produce an unredacted version of EX-2046, but Sterling will not produce the documents listed in EX-2042. Sterling and Meta agree that this stipulation does not waive, forfeit, or otherwise prevent the parties from appealing the issues in this Order on the grounds that it was issued in IPR2025-00299 and not in IPR2025-430. Sterling and Meta both agree that they will not challenge the ability of either party to appeal and/or challenge the determination in this Order as if it were issued in IPR2025-00430.

Dated: December 30, 2025

/s/ Britta Loftus

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 30, 2025 true and correct copies of the foregoing **STIPULATION REGARDING DISCOVERY** were served via electronic mail upon the following counsel of record for Patent Owner:

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Respectfully submitted,

/ Jessica Kaiser /

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Date: December 30, 2025