

May 14, 2025

Matt Colvin
Principal
colvin@fr.com
214 292 4013 direct

VIA E-MAIL (BRIGGS@GTLAW.COM ; JOSKIM@STERNEKESSLER.COM)

Heath Briggs
Greenberg Traurig, LLP
1144 15th Street, Suite 3300
Denver, Colorado 80202

Josephine Kim
Sterne Kessler Goldstein & Fox
1101 K St NW 10th floor
Washington, DC 20005

Re: *Shenzhen Root Technology Co., Ltd. et al. v. Chiaro Technology, Ltd., 2:23-cv-00631*
(WDWA)

Counsel:

Shenzhen Root Technology Co., Ltd. (“Petitioner”) has filed an *inter partes* review (IPR) petition (IPR2025-00554) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 17-19 and 21-33 of U.S. Patent No. 11,806,454. In the IPR petition, Petitioner along with its other related entities are named as real parties-in-interest (collectively “Shenzhen Root”).

I write to inform you that Shenzhen Root hereby stipulates that, if this stipulation is entered into evidence in IPR2025-00554 and the IPR proceeding is instituted, Shenzhen Root will not pursue in the above-captioned litigation, against any claim of U.S. Patent No. 11,806,454, the same grounds as in IPR2025-00554 or any grounds that could have reasonably been raised in the IPR petition (i.e., any ground that could be raised under § 102 or § 103 on the basis of prior art patents or printed publications). *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Pap. 12 at 13-20 (PTAB Dec. 1, 2020) (precedential) (“*Sotera*”).

For the sake of clarity, if the PTAB declines to institute IPR2025-00554 or vacates a decision granting institution of IPR, Shenzhen Root reserves the right to pursue any grounds of invalidity in the above-captioned litigation.

Sincerely,



Matt Colvin
Principal