

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CARVANA, LLC
Petitioner,

v.

INTERNATIONAL BUSINESS MACHINES CORPORATION
Patent Owner.

Inter Partes Review No.: IPR2025-00564

U.S. Patent No. 7,702,719

PETITIONER'S *SOTERA* STIPULATION

In accordance with *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-00109,
Paper 12 at 18–19 (Dec. 1, 2020) (precedential), Petitioner Carvana, LLC
stipulates as follows:

If the PTAB institutes an IPR trial on the grounds presented in Petitioner’s petition filed in this proceeding, Petitioner will not pursue in the co-pending district court litigation (*Carvana, LLC v. International Business Machines Corporation*, Case No. 7:23-cv-08616-KMK-VR (S.D.N.Y.)) any ground that Petitioner raised or reasonably could have raised during this IPR proceeding.

If the PTAB declines to institute the IPR, Petitioner reserves the right to pursue in the co-pending district court litigation any grounds presented or which could have reasonably been presented in this IPR proceeding.

Date: January 31, 2025

Respectfully submitted,

By: /s/ Charley F. Brown

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