
Subject: TJTM Technologies, LLC v. Google LLC: stipulation in connection with Google's IPR No. 2025-00586
Date: Wednesday, May 14, 2025 at 4:59:58 PM Eastern Daylight Time
From: Callaway, Daniel x4924
To: Blair Kittle, Joseph Cotchett, Kevin Boutin, Tamarah Prevost, Vasti Montiel, Paul W. Reidl, EBeffel@hmbay.com, ADunlap@hmbay.com
CC: Liaw, Winston x4497, Mar, Eugene x4927, Andrew Baluch, Beth Laughton
Attachments: image001.png, image002.png, image003.png, image004.png

Counsel for TJTM:

In accordance with the PTAB's precedential decision in *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020), Google LLC agrees that if IPR No. 2025-00586 is instituted, Google will not assert in the related district court proceeding, *TJTM Technologies, LLC v. Google LLC*, No. 3:24-cv-01232-TLT (N.D. Cal.); *appeal docketed*, No. 2025-1218 (Fed. Cir. Nov. 26, 2024) any ground that Google raised or reasonably could have raised during the IPR. Google plans to file a copy of this email as an exhibit in IPR No. 2025-00586. Please let us know if you believe any further memorialization of this stipulation is appropriate.

Thank you,

Dan

Daniel Callaway

Partner

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