

Asim M. Bhansali (SBN 194925)
abhansali@kblfirm.com
Kate E. Lazarus (SBN 268242)
klazarus@kblfirm.com
Elizabeth H. Dinh (SBN 329295)
edinh@kblfirm.com
Amy Le (SBN 341925)
ale@kblfirm.com
KWUN BHANSALI LAZARUS LLP
555 Montgomery Street, Suite 750
San Francisco, CA 94111
Tel: (415) 630-2350

Attorneys for Defendants
GOOGLE LLC and YOUTUBE, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

WITHROW NETWORKS, INC.,

Plaintiff,

v.

GOOGLE LLC and YOUTUBE, LLC,

Defendants.

Case No. 5:24-CV-03203-PCP (VKD)

**NOTICE OF *SOTERA* STIPULATION OF
DEFENDANTS GOOGLE LLC AND
YOUTUBE, LLC**

Date Filed: May 28, 2024

Trial Date: Not set

Defendant Google LLC (“Google”) filed a petition for *inter partes* review (“IPR”) of the patent asserted in this lawsuit (U.S. Patent No. 10,771,849) with the Patent Trial and Appeal Board of the United States Patent and Trademark Office (“PTAB”). This proceeding has been assigned the identifier IPR2025-00775. Defendant YouTube, LLC (“YouTube”) is identified as a real party-in-interest in the IPR2025-00775 proceeding.

Defendants Google and YouTube hereby notify the Court and Plaintiff that Defendants are submitting the following *Sotera* stipulation in connection with the petition in IPR2025-00775. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19, 2020 WL 7049373, at *7 (P.T.A.B. Dec. 1, 2020).

1 Defendants hereby stipulate that if the PTAB institutes IPR (and does not subsequently
2 vacate institution) in response to Google's petition against Plaintiff's U.S. Patent No. 10,771,849
3 (IPR2025-00775), Defendants will not pursue in this litigation, as to the claims challenged in
4 IPR2025-00775: (i) the specific grounds raised in IPR2025-00775 or (ii) any other grounds that
5 reasonably could have been raised before the PTAB in that instituted proceeding.

6 Defendants' *Sotera* stipulation above is not intended and should not be construed to limit
7 Defendants' ability to assert invalidity of any claims of U.S. Patent No. 10,771,849 in this lawsuit
8 based on any other ground not specifically raised in IPR2025-00775 or that reasonably could
9 have been raised before the PTAB in IPR2025-00775.

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11 Dated: July 16, 2025

KWUN BHANSALI LAZARUS LLP

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13 By: /s/ Elizabeth Dinh

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26
27 Attorneys for Defendants
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