

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

USTA TECHNOLOGY, LLC,

Plaintiff,

v.

LENOVO GROUP LIMITED,

Defendant.

Case No. 4:24-cv-00515-SDJ

JURY TRIAL DEMANDED

**LENOVO GROUP LIMITED’S NOTICE OF *SOTERA* STIPULATIONS FOR
U.S. PATENT NO. RE47,720**

Defendant Lenovo Group Limited (“LGL”) will be a real party in interest to a petition for Inter Partes Review (“IPR”) with the Patent Trial and Appeal Board of the United States Patent and Trademark Office (“PTAB”) challenging claims 53 and 95 of asserted U.S. Patent No. RE47,720 (the “’720 patent”), as IPR No. IPR2025-00838. Therefore, LGL hereby notifies the Court and Plaintiff that LGL is submitting the following “*Sotera* stipulation” in support of the petition in IPR2025-00838. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (P.T.A.B. Dec. 1, 2020) (“*Sotera*”).

LGL hereby stipulates that, if the PTAB institutes an IPR proceeding on the grounds presented for claims 53 and 95 of the ’720 patent in IPR2025-00838, LGL will not pursue an invalidity defense in the above-captioned district court litigation that the patent claims subject to the instituted IPR are invalid based on grounds that were raised or reasonably could have been raised during the IPR (i.e., any ground that could have been raised under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications).

LGL’s *Sotera* stipulation is not intended and should not be construed to limit LGL’s ability to assert invalidity of any claims of the asserted patents in this litigation based on any other ground.

Dated: April 25, 2025

Respectfully Submitted,

/s/ D. Clay Holloway

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on April 25, 2025.

/s/ D. Clay Holloway