UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SUZHOU MOJAWA INTELLIGENT ELECTRONIC CO., LTD.,
Petitioner

v.

SHENZHEN SHOKZ CO., LTD.,
Patent Owner

Inter Partes Review No.: IPR2025-00843
U.S. Patent No. 11,310,582

PETITIONER'S STIPULATION

1622086054

Suzhou Mojawa Intelligent Electronic Co., Ltd. ("Petitioner") stipulates that, in accordance with the Board's precedential decision in *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020), if the Board institutes *inter partes* review in this proceeding on the grounds presented in the petition, then Petitioner will not pursue in the parallel district court litigation, *Shenzhen Shokz Co., Ltd. v. Shenzhen Wenming Technology Co., Ltd. et al*, Case No. 1-24-cv-06717 (N.D. Ill.), an invalidity defense based on those grounds that were raised in the IPR or any grounds that could have reasonably been raised in the petition. Petitioner further stipulates that, if the IPR is instituted and proceeds without Director reversal of institution, Petitioner will not assert in the related district court proceeding any system art corresponding (*i.e.*, materially identical) to a reference describing that same system art asserted as a part of a specific ground raised in the IPR, to assert that any claim of the '582 patent is invalid under 35 U.S.C. §§ 102 or 103. Furthermore, Petitioner will not assert in the related district court proceeding any § 103 defense based on a combination of any system prior art with any prior art raised in the Petition. Thus, there will be ***no*** overlap between the issues raised in the Petition and the district court, and this IPR will serve as a "true alternative" to the district court proceeding.

Dated: July 24, 2025

Respectfully submitted,

/s/ James M. Heintz

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Attorney for Petitioner.

CERTIFICATE OF SERVICE

The undersigned certifies that on July 24, 2025, a true and correct copy of the *Petitioner's Stipulation* was served via electronic mail upon the following address, where Patent Owner consented to electronic service:

Perkins-Service-Mojawa-Shokz-IPRs@perkinscoie.com

Respectfully submitted,

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