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VIA EMAIL

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Re: VB Assets, LLC v. Samsung Electronics Co., Ltd. et al., Case No. 2:24-cv-00828-JRG

Dear Counsel,

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) hereby stipulate, consistent with the stipulation made by the Petitioner in *Sotera Wireless Inc. v. Masimo Corp.*, IPR2020-01019, that if the Patent Trial and Appeal Board (“PTAB”) institutes an *inter partes* review (“IPR”) in IPR2025-00869 concerning U.S. Patent No. 8,886,536, then Samsung will not pursue in this litigation the grounds raised or any other grounds that could have been reasonably raised before the PTAB in the instituted proceeding.

Regards,

/s/ PJ McCarthy
PJ McCarthy