

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

PHENIX LONGHORN, LLC,

*Plaintiff,*

v.

AU OPTRONICS CORPORATION,  
HISENSE ELECTRONICA MEXICO, S.A.  
DE C.V., HISENSE USA CORPORATION,  
HISENSE VISUAL TECHNOLOGY CO.,  
LTD., and DOES 1–10,

*Defendants.*

**CASE NO. 2:23-CV-00477-RWS-RSP**

**DEFENDANTS HISENSE MEXICO, HISENSE USA, AND HISENSE VISUAL’S  
STIPULATION PURSUANT TO *SOTERA***

Defendant Hisense USA Corporation (“Hisense USA”) filed a petition for *inter partes* review challenging claims 1-3 and 5-6 of U.S. Patent No. 7,557,788 (the “’788 Patent”) on May 14, 2025 (the “Petition”). Defendants Hisense Electronica Mexico, S.A. DE C.V. (“Hisense Mexico”), Hisense Visual Technology Co., Ltd. (“Hisense Visual”), and Hisense USA (collectively, “Hisense”) hereby stipulate pursuant to the Board’s decision in *Sotera*<sup>1</sup> that, if the Board institutes an *inter partes* review proceeding based on the Petition, Hisense will not pursue in this litigation any ground of invalidity that Hisense USA raised or reasonably could have raised in the Petition.

---

<sup>1</sup> *Sotera Wireless, Inc. v. Masimo Corp.*, Case No. IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020).

DATED: August 6, 2025

Respectfully submitted,

By: /s/ Matias Ferrario

Matias Ferrario (NC Bar No. 38723)

mferrario@ktslaw.com

**KILPATRICK TOWNSEND & STOCKTON LLP**

1001 West Fourth Street

Winston-Salem, NC 27101

Telephone: 336-607-7475

Facsimile: 336-734-2651

Kasey E. Koballa (NC Bar No. 53766)

kkoballa@ktslaw.com

**KILPATRICK TOWNSEND & STOCKTON LLP**

4208 Six Forks Road, Suite 1400

Raleigh, NC 27609

Telephone: 919-420-1712

Facsimile: 202-315-3024

Zoe Stendara (Texas Bar No. 24122986)

**KILPATRICK TOWNSEND & STOCKTON LLP**

zstendara@ktslaw.com

2001 Ross Avenue, Suite 4400

Dallas, TX 75201

Telephone: 214-922-7115

Facsimile: 214-279-1415

*Attorneys for Hisense Electronica Mexico, S.A. DE C.V.,  
Hisense USA Corporation, and Hisense Visual  
Technology Co., Ltd.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served via email on August 6, 2025, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ *Matias Ferrario*  
Matias Ferrario