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SEE MTO.COM FOR JURISDICTIONS OF ADMISSION

May 22, 2025

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VIA EMAIL

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Re: *Sandpiper CDN LLC v. Google LLC*, No. 2:24-3951-AB-RAO (C.D. Cal.)

Dear Rob:

I'm writing to let you know that Google intends to file an IPR petition challenging all the claims of asserted U.S. Patent No. 10,057,322 (the "'322 patent") and offers the following *Sotera* stipulation in support of its petition. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (PTAB Dec. 1, 2020).

Google hereby stipulates that, if the PTAB institutes an IPR proceeding on the grounds presented in Google's petition challenging the claims of the '322 patent, Google will not pursue in this district court litigation the same grounds in the petition or any grounds that reasonably could have been raised during the IPR with respect to the patent claims subjected to the instituted IPR (i.e., any ground that reasonably could have been raised under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications).

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

Best regards,

/s/ Heather E. Takahashi

Heather E. Takahashi

cc: All Counsel of Record