

Anastasia Renard

From: Scott W. Hejny <shejny@McKoolSmith.com>
Sent: Tuesday, January 27, 2026 12:44 PM
To: Jeremy Monaldo; IPR54587-0016IP1
Cc: Nokia-Asus-IPR
Subject: RE: IPR2025-01153 - Sotera Stipulation

Thanks Jeremy. Let's set Dr. Havlicek's deposition for February 16. We'll get a notice out shortly.

Best regards,
Scott

McKool Smith | Scott W. Hejny
Principal | Dallas, TX | Tel: (214) 978-4241

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From: Jeremy Monaldo
Sent: Tuesday, January 27, 2026 11:37 AM
To: Scott W. Hejny ; IPR54587-0016IP1
Cc: Nokia-Asus-IPR
Subject: RE: IPR2025-01153 - Sotera Stipulation

Scott,

Consistent with the stipulation, ASUS is no longer pursuing in the co-pending litigation the specific grounds asserted in *inter partes* review in IPR2025-01153, or any other ground that could have been reasonably raised in IPR2025-01153 (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications). ASUS also is no longer pursuing in the co-pending litigation combinations of the prior art asserted in IPR2025-01153 with unpublished system prior art (or any other type of prior art).

ASUS will make this clear in its Prehearing brief before the ITC. To the extent Nokia has concerns over the prior art grounds being advanced by ASUS in the ITC, ASUS suggests that Nokia's ITC counsel reach out to ASUS's ITC counsel.

Can you let us know whether the proposed dates for Dr. Havlicek's deposition work for you so that we can lock down calendars?

Best,
Jeremy

ASUS-1061
ASUS v. Nokia
IPR2025-01153

Jeremy Monaldo

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1000 Maine Avenue SW, Suite 1000, Washington, DC 20024

From: Scott W. Hejny <shejny@McKoolSmith.com>

Sent: Monday, January 26, 2026 11:10 AM

To: Jeremy Monaldo <Monaldo@fr.com>; IPR54587-0016IP1 <IPR54587-0016IP1@fr.com>

Cc: Nokia-Asus-IPR <Nokia-Asus-IPR@mckoolsmith.com>

Subject: RE: IPR2025-01153 - Sotera Stipulation

Jeremy,

Our question is whether ASUS will drop its §§ 102 and 103 challenges to the validity of the '714 patent in the co-pending ITC and CDCA cases. ASUS promised the PTAB that ASUS would do so in the event its IPR petition (IPR2025-01153) was instituted. The IPR was instituted, yet ASUS does not appear to have followed through on its promise.

For clarity, here are the grounds ASUS continues to assert in at least the co-pending ITC case:

- D231 and WD4
- E101 and WD4
- Nakamura and WD4
- Rusert and Karczewicz '721

Please confirm by COB January 27 that ASUS will drop these grounds (and all other grounds covered by ASUS's *Sotera* stipulation) in the co-pending ITC proceeding. We would appreciate a yes or no answer so there is no ambiguity. Nokia intends to raise this issue with the PTAB if ASUS does not answer or otherwise does not follow through on its *Sotera* stipulation.

Best regards,
Scott

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From: Jeremy Monaldo <Monaldo@fr.com>
Sent: Thursday, January 22, 2026 11:02 AM
To: Scott W. Hejny <shejny@McKoolSmith.com>; IPR54587-0016IP1 <IPR54587-0016IP1@fr.com>
Cc: Nokia-Asus-IPR <Nokia-Asus-IPR@mckoolsmith.com>
Subject: RE: IPR2025-01153 - Sotera Stipulation

Scott,

ASUS stands by the stipulation entered in IPR2025-01153.

Best,
Jeremy

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1000 Maine Avenue SW, Suite 1000, Washington, DC 20024

From: Scott W. Hejny <shejny@McKoolSmith.com>
Sent: Wednesday, January 21, 2026 5:49 PM
To: Jeremy Monaldo <Monaldo@fr.com>; IPR54587-0016IP1 <IPR54587-0016IP1@fr.com>
Cc: Nokia-Asus-IPR <Nokia-Asus-IPR@mckoolsmith.com>
Subject: IPR2025-01153 - Sotera Stipulation

[This email originated outside of F&R.]

Counsel,

In view of the PTAB's institution of trial in IPR2025-01153, please confirm that ASUS intends to honor its *Sotera* stipulation and drop its §§ 102 and 103 challenges to the validity of the '714 patent in the parallel ITC and CDCA cases. The text of ASUS's *Sotera* stipulation is shown below.

- ASUS hereby stipulates that, if the PTAB institutes review in IPR2025- 01153, ASUS will not pursue in the co-pending litigation the specific grounds asserted in inter partes review in IPR2025-01153,

or any other ground that could have been reasonably raised in IPR2025-01153 (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications).” See *Sotera Wireless, Inc. v. Masimo Corporation*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). ASUS also stipulates that, if the PTAB institutes review in IPR2025-01153, ASUS will not pursue in the co-pending litigation combinations of the prior art asserted in IPR2025-01153 with unpublished system prior art (or any other type of prior art). See *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025).

Best regards,
Scott

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