Filed: August 22, 2025

Filed on behalf of Pinterest, Inc.

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PINTEREST, INC.
Petitioner

v.

OPENTV, INC.,
Patent Owner.

IPR2025-01184
U.S. Patent No. 7,055,169

PETITIONER'S UPDATED MANDATORY NOTICES

Petitioner Pinterest, Inc. ("Petitioner") provides the following update to the mandatory notices pursuant to 37 C.F.R. § 42.8(b)(2).

I. RELATED MATTERS

As noted in the Petition, the '169 Patent is the subject of pending district court litigation involving Petitioner: *OpenTV, Inc. v. Pinterest, Inc.,* No. 1:24-cv-01301-CFC (D. Del.), filed on February 18, 2025. (Petition at 1.)

On August 18, 2025, Petitioner stipulated as follows:

> Petitioner hereby stipulates that if the Patent Trial and Appeal Board ("PTAB") institutes an *inter partes* review on IPR2025-01184 ("IPR"), then Petitioner (i) will not pursue in the pending district court litigation the specific grounds of invalidity that were raised or grounds that reasonably could have been raised under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications in the IPR, and (ii) will not pursue in the pending district court litigation grounds of invalidity under 35 U.S.C. §§ 102 or 103 that cite to any of the prior art references listed in the grounds for the IPR with respect to any challenged claim (see Grounds 1-8, in Section VII of the IPR Petition), including in combination with any other prior art that could not have been raised in the IPR (e.g., system art) for grounds of invalidity under 35 U.S.C. § 103. To avoid any doubt, if the PTAB declines institution or rescinds institution of the IPR, then Petitioner reserves the right to pursue any grounds of invalidity, including but not limited to the grounds in (i) and (ii), in the pending district court litigation.

Dated: August 22, 2025

Respectfully submitted,

By: / Grace I. Wang /

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Counsel for Petitioner
PINTEREST, INC.

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2025, a true and correct copy of the foregoing **PETITIONER'S UPDATED MANDATORY NOTICES** is being served by electronic mail on Patent Owner's counsel of record pursuant to its Mandatory Notices in this proceeding as follows:

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Dated: August 22, 2025

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