
From: Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>
Sent: Friday, August 15, 2025 12:17 PM
To: acaridis; gerla@ls3ip.com; croberts@orrick.com; richter@ls3ip.com; lee@ls3ip.com; pak@ls3ip.com; smith@ls3ip.com; boyea@ls3ip.com; Rory Shea; Sean Sullivan; Moss, Geoffrey
Cc: QE-Google-CDCA169; Sonos-CDCA0169-service; LS3_team@ls3ip.com
Subject: IPR2025-01213 (883 Patent) – Sotera Stipulation

Counsel,

Google has filed IPR2025-01213 challenging asserted U.S. Patent No. 10,541,883 (the “’883 patent”) and now 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 IPR2025-01213 on the grounds presented in the Petition challenging the claims of the ’883 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,
Ogi