
From: Bryon Wasserman
Sent: Monday, November 03, 2025 4:25 PM
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Cc: David Radulescu; Etai Lahav; JTigan; AGS-Jesco_Service; Yenerall, Ben; thomas@fyiplaw.com
Subject: AGS Lighting Management LLC v. Jesco Lighting Group, LLC (Case No. 1:25-cv-00141-MN)
Attachments: 2025.11.2 Stipulation Regarding Invalidity .pdf

Counsel, please see the attached stipulation.

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AGS LIGHTING MANAGEMENT LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 25-141 (MN)
	)	
JESCO LIGHTING GROUP, LLC,	)	
	)	
Defendant.	)	

NOTICE OF SOTERA STIPULATION

Defendant Jesco Lighting Group, LLC (“Jesco” or “Defendant”) hereby submits this stipulation regarding invalidity.

In the Complaint filed February 4, 2025 (D.I. 1), Plaintiff AGS Lighting Management LLC (“AGS” or “Plaintiff”) asserts that Jesco infringes U.S. Patent No. 11,751,302 (the “’302 Patent”). On July 19, 2025, Defendant/Petitioner Jesco filed its petition (“the Petition”) for *Inter Partes* review (“IPR”) challenging claims 1-20 of the ’302 Patent.¹ The Petition asserts the following grounds of invalidity:

Patent	Grounds
'302 Patent	Ground 1- Claims 1, 2, 4-7 and 9-20 are obvious over U.S. Patent No. 9,995,440 (“Edwards”) in view of U.S. Patent Publication No. 2019/0320515 (“Sadwick”) Ground 2-Claims 2, 3, and 8 are obvious over Edwards in view of Sadwick and further in view of U.S. Patent No. 10,683,969 (“Jeswani”) Ground 3-Claims 1-14 and 16-20 are obvious over U.S. Patent Publication No. US 2019/0041009 (“May”) in view of Jeswani Ground 4- Claim 15 is obvious over May in view of Teswani and further in view of Sadwick

¹ Proceeding IPR2025-01328.

Defendant hereby notifies Plaintiff that Defendant is providing the following broadened *Sotera* stipulation in connection with the Petition. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020) (“*Sotera*”) (describing the standard, unbroadened *Sotera* stipulation).

Defendant hereby stipulates that *if* the PTAB institutes an IPR (and does not subsequently vacate, reverse, or otherwise withdraw institution) in response to Defendant’s Petition, Defendant will not pursue in the above-captioned litigation:

- (i) the specific grounds raised in the Petition;
- (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (*i.e.*, any ground that could have reasonably been raised under §§ 102 or 103 on the basis of only prior art patents or printed publications);
- (iii) or any ground based on a system which corresponds to a patent or printed publication asserted as part of a ground raised in the Petition (as reflected in the table of statutory grounds on page 9 of the Petition).

November 3, 2025

/s/ Bryon Wasserman

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LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on November 3, 2025, to counsel of record via electronic mail.

/s/ Bryon Wasserman
Bryon Wasserman