

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HISENSE USA CORPORATION; and
HISENSE ELECTRONICA MEXICO S.A. de C.V.
Petitioners,

v.

VIDEOLABS, INC.,
Patent Owner.

Case No. IPR2025-01329
Patent No. 7,769,238

NOTICE OF PETITIONER'S *SOTERA* STIPULATION

In accordance with the Board’s precedential decision in *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020), Hisense USA Corporation and Hisense Electronica Mexico S.A. de C.V. (“Petitioner” or “Hisense”) stipulates that if the Board institutes *inter partes* review (and that institution is not subsequently vacated) in this proceeding, IPR2025-01329, Petitioner will not pursue in the following district court proceeding, *VideoLabs, Inc. v. Hisense et. al.*, 2:24-cv-00904 (E.D. Tex.) (“District Court Action”) (i) the specific grounds raised in IPR2025-01329, or (ii) any other ground that could have reasonably been raised before the Board in that instituted proceeding (*i.e.*, any other ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications). See FAQs for Interim Processes for PTAB Workload Management (<https://www.uspto.gov/patents/ptab/faqs/interim-processes-workload-management>), PTAB response to FAQ 14 (indicating that *Sotera* stipulations should be filed “as soon as practicable[.]”).

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: August 5, 2025

/Richard F. Martinelli/

Richard F. Martinelli

Orrick, Herrington & Sutcliffe LLP

Registration No. 52,003

51 West 52nd Street

New York, NY 10019-6142

Tel: 212-506-3702

Email: RFMPTABDocket@orrick.com

Attorneys for Petitioners

CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper was caused to be served on August 5, 2025 via electronic mail, upon the following attorneys of record for the Patent Owner:

Wayne M. Helge whelge@bdiplaw.com
James T. Wilson jwilson@bdiplaw.com
BDIP-VideoLabs_Hisense@bdiplaw.com.
BUNSOW DE MORY LLP

/Karen Johnson/

Karen Johnson