

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

REGIONS BANK
Petitioner,

v.

UNITED SERVICES AUTOMOBILE ASSOCIATION
Patent Owner.

Case No. IPR2025-01356
U.S. Patent No. 12,211,095

NOTICE OF PETITIONER'S *SOTERA* STIPULATION

EXHIBIT 1081
REGIONS v. USAA
IPR2025-01356

In accordance with the Board’s precedential decision in *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12, 18-19 (PTAB Dec. 1, 2020), Regions Bank (“Petitioner”) hereby stipulates that, if the Board institutes *inter partes* review in this proceeding, IPR2025-01356, Petitioner will not pursue in the district court proceeding, *United Services Auto. Ass’n v. Regions Bank*, No. 2:25-cv-00082 (E.D. Tex.) (the “District Court Action”), (1) the specific grounds asserted in the Petition (Paper 3), or (2) any other ground that could reasonably have been raised before the Board in that instituted proceeding with respect to U.S. Patent No. 12,211,095 (i.e., any other ground that could have reasonably been raised under 35 U.S.C. §§102 or 103 on the basis of prior art patents or printed publications).

This stipulation is not intended, and should not be construed, to limit Petitioner’s ability to assert unenforceability or invalidity of any claim of the ’095 patent in the District Court Action on any other ground that was not raised or could not reasonably have been raised in IPR2025-01356, regardless of whether *inter partes* review is instituted.

Respectfully submitted,

DATED: September 25, 2025

By: /David L. Cavanaugh/
David L. Cavanaugh
Registration No. 36,476

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2025, I caused a true and correct copy of the foregoing materials:

- EX1081
- Updated Exhibit List

to be served on the Patent Owner via electronic mail to:

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DATED: September 25, 2025

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