Filed: October 6, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

MESSAGELOUD, INC.,

Patent Owner.

Case No. IPR2025-01429
U.S. Patent No. 10,516,775

PETITIONER'S *SOTERA* STIPULATION

If IPR is instituted in IPR2025-01429, unless institution is later vacated, reversed, or otherwise withdrawn by rehearing or Director Review, Apple Inc. stipulates that, consistent with *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential as to § II.A.), Apple will not pursue in Civil Action No. 6:25-cv-00185-RP, against the '775 patent, (i) the specific grounds asserted in IPR2025-01429, or (ii) any other ground that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications).

Respectfully submitted,

Date: October 6, 2025

By: / Joshua L. Goldberg /
Joshua L. Goldberg, Lead Counsel
Reg. No. 59,369

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Petitioner's *Sotera* Stipulation** was served electronically via email on October 6, 2025, in its entirety on the following:

Sergey Kolmykov
skolmykov@kskiplaw.com

Gaston Kroub
gkroub@kskiplaw.com

Patent Owner has consented to service by email.

Dated: October 6, 2025

Respectfully submitted,

/Lisa C. Hines/
Lisa C. Hines
Case Manager
Finnegan, Henderson, Farabow,
Garret & Dunner LLP