

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TIKTOK INC.,

Petitioner,

v.

SHOPSEE, INC.,

Patent Owner.

Case No. IPR2025-01485

U.S. Patent No. 11,134,316

PETITIONER'S STIPULATION

Petitioners hereby stipulate that, if the Board institutes inter partes review in this proceeding, IPR2025-01485, and the institution decision is not subsequently vacated or terminated other than via a Final Written Decision under 35 U.S.C. § 318(a), Petitioners will not pursue in the parallel litigation, *ShopSee, Inc. v. TikTok, Inc.*, Case No. 7:24-cv-00333-DC-DTG (W.D. Tex.):

- (1) the specific Grounds asserted in the Petition (Paper 1); 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. 11,134,316 (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 U.S. Patent No. 11,134,316 in the District Court Action on any other ground that was not raised or could not reasonably have been raised in IPR2025-01485, regardless of whether inter partes review is instituted.

DATED: October 2, 2025

Respectfully submitted,

By /s/ James M. Glass
James M. Glass (Reg. No. 46,729)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
295 5th Avenue, 9th Floor
New York, NY 10016
Tel: (212) 849-7000
jimglass@quinnemanuel.com

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on October 2, 2025 the foregoing document was served via email on the following counsel of record:

LATHAM & WATKINS LLP
Raghav Bajaj (Reg. No. 66,630)
Joseph Previti (Reg. No. 80,188)
300 Colorado St., Suite 2400
Austin, TX 78701
Telephone: (737) 910-7300
Facsimile: (737) 910-7301
raghav.bajaj@lw.com
joe.previti@lw.com

Matthew J. Moore (Reg. No. 42,012)
Rachel L. Weiner Cohen (*pro hac vice* motion to be filed)
Tiffany C. Weston (Reg. No. 79,469)
555 Eleventh Street NW, Suite 1000
Washington, D.C. 20004-1304
Telephone: (202) 637-2200
Facsimile: (202) 637-2201
matthew.moore@lw.com
rachel.cohen@lw.com
tiffany.weston@lw.com

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James M. Glass (Reg. No. 46,729)
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