

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

---

**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

---

SHENZHEN QIANFENYI INTELLIGENT TECHNOLOGY CO., LTD.,

Petitioner,

v.

WACOM CO. LTD.,

Patent Owner.

---

*Inter Partes* Review No. IPR2025-01495

U.S. Patent No. 9,933,866

---

**PETITIONER'S *SOTERA* STIPULATION**

If *inter partes* review is instituted in IPR2025-01495, unless institution is later vacated, reversed, terminated prior to a final decision, or otherwise withdrawn by rehearing or Director Review, Petitioner Shenzhen Qianfenyi Intelligent Technology Co., Ltd. (“Maxeye”) 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), Maxeye will not pursue in Case No. 2:24-cv-702-JRG in the United States District Court for the Eastern District of Texas, Marshall Division, against the ’866 patent, (i) the specific grounds asserted in IPR2025-01495, 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 patents or printed publications).

Please take notice that Petitioner also filed a *Sotera* Stipulation in *Wacom Co. Ltd. v. Shenzhen Qianfenyi Intelligent Technology Co., Ltd.*, No. 2:24-cv-00702-JRG (E.D. Tex.) on November 5, 2025 (Dkt. 61).

Dated: November 6, 2025

Respectfully submitted,

/Mark Miller/  
Mark Miller  
Registration No. 44,944  
DORSEY & WHITNEY LLP  
Telephone: +1(801) 933-4068  
*Attorney for Petitioner*

## **CERTIFICATE OF SERVICE**

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

*Via E-mail:*

Wayne M. Helge  
James T. Wilson  
Richard C. Lin

**BUNSOW DE MORY LLP**  
277 S. Washington St., Suite 210  
Alexandria, VA 22314  
701 El Camino Real  
Redwood City, CA 94063

whelge@bdiplaw.com  
jwilson@bdiplaw.com  
rlin@bdiplaw.com  
erobinson@bdiplaw.com  
BDIP-Wacom\_Maxeye@bdiplaw.com

*Attorneys for Patent Owner Wacom Co., Ltd.*

Patent owner has consented to service by email.

/Mark Miller/  
Mark Miller  
Registration No. 44,944  
DORSEY & WHITNEY LLP  
*Attorney for Petitioner*