IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

WACOM CO., LTD., Plaintiff, v. SHENZHEN QIANFENYI INTELLIGENT TECHNOLOGY CO., LTD., Defendant.	Civil Action No.: 2:24-cv-702-JRG JURY TRIAL DEMANDED

NOTICE OF SOTERA STIPULATION OF DEFENDANT SHENZHEN QIANFENYI INTELLIGENT TECHNOLOGY CO., LTD

Defendant Shenzhen Qianfenyi Intelligent Technology Co., Ltd ("Maxeye") submits this stipulation of invalidity contentions.

In August and September 2025, Maxeye filed four petitions with the Patent and Trial Appeal Board requesting *inter partes* review of four patents asserted in this litigation. The petitions are listed below with their respective patent number, filing date, and challenged claims:

IPR No.	U.S. Patent No.	Notice of Filing Date	Claims Challenged
IPR2025-01495	9,933,866	August 29, 2025	1-7, 15-16
IPR2025-01533	9,977,519	September 10, 2025	1-4, 6, 7, 9, 10, 12-14, 16, 17, 19-24
IPR2025-01556	9,280,220	September 17, 2025	1-5, 7-11, 13-17
IPR2025-01596	10,108,277	September 30, 2025	1-5, 7-12, 14-18, 20-24

IPR2025-01495 Challenging U.S. Patent 9,933,866

The below chart summarizes the statutory grounds for challenges in IPR2025-01495 challenging the '866 patent, as set forth in the Petition itself:

Ground	Challenged Claims	Basis for Rejection
1	1-7 and 15-16	35 U.S.C. §§ 102/103: Kremin
2	1-7 and 15-16	35 U.S.C. § 103: Kremin/Partow
3	1-7 and 15-16	35 U.S.C. §§ 102/103: Westhues
4	1-7 and 15-16	35 U.S.C. § 103: Westhues/Kremin

IPR2025-01533 Challenging U.S. Patent 9,977,519

The below chart summarizes the statutory grounds for challenges in IPR2025-01533 challenging the ’519 patent, as set forth in the Petition itself:

Ground	Challenged Claims	Basis for Rejection
1	1-4, 7, 9, 10, 12-14, 17, 19-21, 23, and 24	35 U.S.C. §§ 102/103: Sundara-Rajan
2	1, 2, 4, 7, 12-14, 17, 19, 21, and 24	35 U.S.C. § 103: Sundara-Rajan/Kremin’926
3	1, 4, 6, 12, 14, 16, and 20-22	35 U.S.C. § 103: Kremin’361/Sundara-Rajan
4	1-4, 6, 7, 9, 10, 12-14, 16, 17, and 19-24	35 U.S.C. § 103: Lefevre/Chandran

IPR2025-01556 Challenging U.S. Patent 9,280,220

The below chart summarizes the statutory grounds for challenges in IPR2025-01556 challenging the ’220 patent, as set forth in the Petition itself:

Ground	Challenged Claims	Basis for Rejection
1	1-5, 7-11, and 13-17	35 U.S.C. § 103: Kaneko/Vuppu
2	1-5, 7-11, and 13-17	35 U.S.C. § 103: Kaneko/Vuppu/Cao/King-Smith
3	1-5, 7-11, and 13-17	35 U.S.C. § 103: Kaneko/ Harley
4	1-5, 7-11, and 13-17	35 U.S.C. § 103: Kaneko/Harley/Cao/King-Smith
5	1-5, 7-11, and 13-17	35 U.S.C. §§ 102/103: Kremin
6	1-5, 7-11, and 13-17	35 U.S.C. § 103: Kremin/Harley

IPR2025-01596 Challenging U.S. Patent 9,977,277

The below chart summarizes the statutory grounds for challenges in IPR2025-01596 challenging the '277 patent, as set forth in the Petition itself:

Ground	Challenged Claims	Basis for Rejection
1	1-5, 7-12, 14-18, and 20-24	35 U.S.C. § 103: Yoshida/Ikeda
2	1-5, 8-12, 14-18, and 21-24	35 U.S.C. § 103: Yoshida/Iguchi

Maxeye hereby stipulates that if the Patent and Trial Appeal Board institutes an IPR on IPR2025-01495, IPR2025-01533, IPR2025-01556, and/or IPR2025-01596, then Maxeye will not pursue in this case the specific grounds identified above in connection with the referenced patent claim(s) (as presently issued) on the instituted *inter partes* review petition, or on any other ground for a given patent claim for which the Board institutes, that was raised or could have reasonably been 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).

This stipulation does not limit Defendants' ability to assert invalidity of the asserted claims of the asserted patents in this case on any other ground (*e.g.*, invalidity under 35 U.S.C. §§ 102 or 103 on the basis of prior invention, derivation, or prior art systems or products, invalidity under 35 U.S.C. §§ 101, 112, or invalidity for obviousness-type double patenting), regardless of whether *inter partes* review is instituted. This stipulation also does not limit Defendants' use of prior art patents and printed publications for any purpose other than showing invalidity under 35 U.S.C. §§ 102 or 103 (*e.g.,* to show non-infringing alternatives, to show the state of the art, in connection with a reasonable royalty or lost profits analysis, to show inequitable conduct, or to cross-examine witnesses), regardless of whether *inter partes* review is instituted. Furthermore, this stipulation does not apply to any claim on which the Board does not

institute *inter partes* review. If the Board institutes *inter partes* review but the proceeding is terminated prior to a final decision—*e.g.*, if institution is reversed—then the stipulation becomes ineffective upon termination of the *inter partes* review.

Dated: November 5, 2025

Respectfully submitted,

/s/ Mark A. Miller

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CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notifications of such filing to all counsel of record who have appeared in this case and that any other counsel of record have been served by another authorized manner.

/s/ Mark A. Miller
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