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

PERCEPTIVE AUTOMATA, LLC,	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No. 2:25-cv-742-JRG
	)	
TESLA, INC.,	)	
	)	
Defendant.	)	
	)	

NOTICE OF BROADENED *SOTERA* PLUS STIPULATION
OF DEFENDANT TESLA, INC.

Defendant Tesla, Inc. ("Tesla") filed petitions for *Inter Partes* review ("IPR") of all five asserted patents in this lawsuit with the Patent Trial and Appeal Board of the United States Patent and Trademark Office ("the PTAB"). The following table identifies the IPR proceedings of those five patents, the date the IPR petitions were filed, the patents involved in the IPR proceedings, and the claims challenged in each IPR proceeding. The claims challenged in these IPR proceedings include all asserted claims in this lawsuit.

IPR No.	Patent No.	IPR Petition Filed	Claims Challenged
IPR2025-01573	U.S. 10,614,344	September 20, 2025	1-22
IPR2025-01574	U.S. 11,126,889	October 2, 2025	1-20
IPR2025-01575	U.S. 11,753,046	October 1, 2025	1-19
IPR2025-01576	U.S. 11,467,579	October 9, 2025	1-20
IPR2025-01577	U.S. 11,520,346	October 10, 2025	1-23

Tesla hereby notifies the Court and Plaintiff that Tesla is submitting the following broadened *Sotera* stipulation ("*Sotera* Plus stipulation") in connection with the IPRs identified in

the table above. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-02019, Paper 12, at 18-19 (PTAB Dec. 1, 2020) ("*Sotera*") (describing the standard, unbroadened *Sotera* stipulation).

Tesla hereby stipulates that, if the PTAB institutes any of the above listed IPRs (and does not subsequently vacate institution or otherwise terminate the IPR without a Final Written Decision), then, with respect to the patent being challenged in the instituted IPR, Tesla will not assert or otherwise argue at trial that any claim of the patent is invalid on the basis of: (i) the specific grounds raised in the instituted IPR, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (*i.e.*, any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground based on a combination of system prior art and the references asserted as part of a ground raised in the corresponding instituted IPR.

Tesla's *Sotera* Plus stipulation above is not intended to limit Tesla's ability to assert invalidity of any claims of the patents-at-issue in this lawsuit based on any other ground.

Dated: November 10, 2025

Respectfully submitted,

By: */s/ Roger Fulghum*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on November 10, 2025.

/s/ Roger Fulghum
Roger Fulghum