UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSARA INC.
Petitioner

v.

MOTIVE TECHNOLOGIES, INC.
Patent Owner

Case IPR2026-00108
U.S. Patent No. 12,062,243

PETITIONER'S STIPULATION REGARDING 35 U.S.C. § 315(e)(2)

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I. STIPULATION

If the Board institutes this IPR, Petitioner will not raise in district court (*Motive Techs. Inc. f/k/a Keep Truckin, Inc. v. Samsara Inc.*, No. 3:24-cv-00902 (N.D. Cal)) any grounds raised or that reasonably could have been raised in the Petition or any grounds that are combinations of the prior art asserted in this IPR with unpublished system prior art. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (P.T.A.B. Dec. 1, 2020) (precedential as to II.A); *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, Paper 19 at 4 (P.T.A.B. Mar. 28, 2025).

Respectfully submitted,

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/Jason D. Eisenberg/

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Date: December 16, 2025

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

The undersigned hereby certifies that the foregoing **PETITIONER'S STIPULATION REGARDING 35 U.S.C. § 315(e)(2)** was served electronically via e-mail on December 16, 2025, in its entirety on the following counsel of record for Patent Owner:

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