EXHIBIT A

GIBSON, DUNN & CRUTCHER LLP
JOSH KREVITT (SBN 208552)
JKrevitt@gibsondunn.com
STUART M. ROSENBERG (SBN 239926)
SRosenberg@gibsondunn.com
310 University Avenue
Palo Alto, CA 94301
Telephone: 650.849.5300
Facsimile: 650.849.5333

BRIAN A. ROSENTHAL (*pro hac vice*)
BRosenthal@gibsondunn.com
KATHERINE Q. DOMINGUEZ (*pro hac vice*)
KDominguez@gibsondunn.com
ALLEN KATHIR (*pro hac vice*)
AKathir@gibsondunn.com
ALLYSON PARKS (*pro hac vice*)
AParks@gibsondunn.com
200 Park Avenue
New York, NY 10166
Telephone: 212.351.4000
Facsimile: 212.351.4035

GIBSON, DUNN & CRUTCHER LLP
JAYSEN S. CHUNG (SBN 280708)
JSChung@gibsondunn.com
One Embarcadero Center, Suite 2600
San Francisco, CA 94111
Telephone: 415.393.8200
Facsimile: 415.393.8306

NATHANIEL R. SCHARN (SBN 305836)
NScharn@gibsondunn.com
3161 Michelson Drive, Suite 1200
Irvine, CA 92612
Telephone: 949.451.3800
Facsimile: 949.451.4220

HANNAH L. BEDARD (*pro hac vice*)
HBedard@gibsondunn.com
WENDY W. CAI (*pro hac vice*)
WCai@gibsondunn.com
1700 M STREET, NW
Washington, DC 20036
Telephone: 202.955.8500
Facsimile: 202.467.0539

Attorneys for Defendant Samsara Inc.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

MOTIVE TECHNOLOGIES, INC., Plaintiff and Counterclaim Defendant, v. SAMSARA INC., Defendant and Counterclaim Plaintiff.	CASE NO. 3:24-CV-00902-JD **SAMSARA INC.'S REPLY IN SUPPORT OF ITS MOTION FOR PARTIAL STAY PENDING *INTER PARTES* REVIEW**

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ABBREVIATION	DESCRIPTION
’243 patent	U.S. Pat. No. 12,062,243
’276 patent	U.S. Pat. No. 12,136,276
’580 patent	U.S. Pat. No. 11,875,580
IPR	*Inter Partes* Review
Motive	Plaintiff and Counterclaim Defendant Motive Technologies, Inc.
PTAB	Patent Trial and Appeal Board
PTO	U.S. Patent and Trademark Office
Samsara	Defendant and Counterclaim Plaintiff Samsara Inc.
Br.	Defendant Samsara’s Motion for Partial Stay Pending *Inter Partes* Review (Dkt. No. 147)
Opposition or Opp.	Plaintiff Motive’s Opposition to Defendant Samsara’s Motion for Partial Stay (Dkt. No. 148)

I. INTRODUCTION

Motive does not meaningfully address the relevant stay factors. It does not deny the IPRs would simplify the issues in its patent infringement case, which represents a significant portion of this litigation. Instead, Motive overstates that there is "substantial overlap" between its patent infringement case and the rest of the litigation (*i.e.*, Samsara's patent infringement case and Motive's non-patent causes of action). But any overlap is minimal—the other parts of this case involve different patents with distinct subject matter, different accused products, and separate witnesses and evidence. And while Motive tries to downplay the technical overlap between the '580 patent (for which IPR has already been instituted) and the '276 and '243 patents, Motive told the Court earlier this year that Motive should be permitted to add the '276 and '243 patents to this case *because* they involve subject matter that is similar to the '580 patent.

Motive's arguments regarding the other two stay factors are also without merit. As to the stage of this case, Motive cannot and does not dispute that the most burdensome parts of its patent infringement case are still ahead, including claim construction, the bulk of fact discovery, expert discovery, dispositive motions, and the August 2027 trial. Instead, Motive points to the parties' pending motions to dismiss and early discovery. But much of that relates to Motive's non-patent causes of action and Samsara's patent infringement case that will proceed regardless—their existence does not eliminate the efficiencies gained by staying Motive's separate patent infringement case while the IPRs on Motive's asserted patents proceed. Motive also relies heavily on the fact that it filed this case in February 2024, but neglects to acknowledge the case was stayed for nearly half that time. Finally, Motive makes several claims of prejudice, but none holds water. Motive, for example, accuses Samsara of delay. But Samsara did not delay in filing the IPR petitions or this stay motion. Samsara filed the now-instituted '580 IPR petition during the stay of this case, and filed the '276 and '243 IPRs just months after Motive added them to this litigation. Samsara filed this stay motion a week after the last petition was filed. Thus, Motive's patent infringement case should be stayed pending final resolution of the IPRs and any appeals.

II. ARGUMENT

A. A Stay Would Significantly Simplify the Issues

i. A Stay Would Simplify or Eliminate Motive's Patent Infringement Claims, Which Are Distinct from the Other Claims in This Case

Motive does not seriously dispute that IPR of its three asserted patents would simplify at least the issues in Motive's patent infringement case.

Apart from questioning whether the '276 and '243 IPRs will be instituted (which is the most likely, *see infra* Part II.A.ii), Motive does not deny that if the PTAB finds any of Motive's asserted claims unpatentable, the case will be simplified. *See Inari Med., Inc. v. Imperative Care, Inc.*, 2025 WL 2772596, at *3 (N.D. Cal. Sept. 29, 2025). The IPRs will also narrow or eliminate invalidity issues through estoppel and focus prior-art disputes, which in turn will streamline expert discovery and dispositive motions.[1] *Id.*

Nor does Motive deny that, regardless of the PTAB's final written decisions on any of the three asserted patents, the IPRs will materially inform this Court's work by refining claim construction and other substantive issues concerning those patents and binding the parties to positions taken before the Board. *See* Opp. 8–9; Br. 12–13; *Inari Med.*, 2025 WL 2772596, at *3 ("[T]he IPR proceedings 'could clarify the scope and interpretation of the asserted claims.'" (quoting *Anza Tech., Inc. v. Toshiba Am. Elec. Components Inc.*, 2018 WL 4859167, at *2 (N.D. Cal. Sept. 28, 2018))); *Realtime Data LLC v. Teradata Ops., Inc.*, 2017 WL 3453295, at *2 (C.D. Cal. Feb. 27, 2017) (stay pending IPR provides "a richer prosecution history upon which to base necessary claim construction determinations"); *Core Optical Techs. v. Fujitsu Network Commc'ns, Inc.*, 2016 WL 7507760, at *2 (C.D. Cal. Sept. 12, 2016) ("Even if no patent claim is eliminated, the intrinsic record developed during the IPR may inform on issues like claim construction."). Because the IPR proceedings will run in parallel with the current *Markman* deadlines and generate intrinsic evidence and party positions that courts routinely consider in construing claims, it is likely that, without a stay now, claim construction proceedings on Motive's patents would need to be conducted twice—once under the current schedule and again to account for the IPR proceedings. *See, e.g.*, *Uniloc USA Inc. v. LG Elecs. U.S.A. Inc.*, 2019 WL 1905161, at *4 (N.D. Cal. Apr. 29, 2019) ("[G]iven the degree to which the PTO's decisions may impact these cases, it would be

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[1] As Motive acknowledges, Samsara agreed to be estopped from raising with the Court challenges it could have raised in the '580 IPR. Br. 13. On November 17 and December 16, Samsara filed the same stipulations for the '276 and '243 patents, respectively. IPR2026-00034, Paper 6; IPR2026-00108, Paper 6. Thus, Motive's suggestion that Samsara would not make the same stipulation for all three patents should be ignored. In fact, Samsara's *Sotera* stipulations to be bound by estoppel under 35 U.S.C. § 315(e)(2) confirm that duplicative arguments will be eliminated, weighing further in favor of a stay. *See X1 Discovery, Inc. v. Microsoft Corp.*, 2025 U.S. Dist. LEXIS 181732, at *8 (C.D. Cal. Sep. 16, 2025).

particularly wasteful to require the parties to proceed with preparations and filings that may be reshaped or entirely mooted a short while later."). Of course, the Court would not need to expend any resources on claim construction for Motive's patents if the IPRs result in the cancellation of their asserted claims.

Motive argues that there is "substantial overlap" between all thirteen causes of action in this litigation (*i.e.*, Motive's patent infringement claims, Motive's non-patent causes of actions, and Samsara's patent infringement counterclaims), contending they all "arise from overlapping products, technologies, and witnesses." Opp. 6–7. Motive fails to identify any specific overlap between its patent infringement case and its non-patent causes of action. *See id*. Nor could it. Motive's non-patent causes of action center on Samsara's and its employees' alleged wrongful conduct and have no real overlap with Motive's asserted patents. Likewise, in its Second Amended Complaint, Motive set out its infringement allegations in paragraphs 53–65 but did not incorporate those paragraphs into its non-patent causes of action. *See* Dkt. 107 ¶¶ 170, 183, 194, 201, 212, 224, 238. As another example, Motive's non-patent causes of action involve allegations related to "copying," but those copying allegations do not relate to Motive's patent infringement case. Indeed, Motive does not allege Samsara willfully infringed Motive's asserted patents. *See generally* Dkt. 107 (Second Amended Complaint). Finally, Motive's trade secret misappropriation claims cannot be related to Motive's patent infringement case because, by definition, information disclosed in a patent cannot be a trade secret. Dkt. No. 107 ¶¶ 201–11, 212–23 (claims under CUTSA and DTSA); *Olaplex, Inc. v. L'Oréal USA, Inc.*, 855 F. App'x 701, 707 (Fed. Cir. 2021) ("A trade secret is secret. A patent is not. That which is disclosed in a patent cannot be a trade secret.").

Nor does Motive identify any specific overlap between the parties' respective patent infringement cases. This is no surprise, as the technologies are unrelated. Motive's asserted patents (at issue in this motion) relate to dashcam calibration and distracted driving detection; Samsara's asserted patents (not at issue here) relate to remote vehicle immobilization and securely obtaining data from sensors. Reflecting that separation, the briefing on Motive's motion to dismiss Samsara's patents did not mention Motive's patents. *See* Dkt. Nos. 97, 102, 105. Claim construction will likewise involve different patent file histories and extrinsic evidence.

To the extent there is any overlap at all, it is at the high level that both parties operate in the fleet management space (*e.g.*, the parties have dash cam-related offerings). But the specific proof, issues, and

claim terms that will drive discovery, expert work, and motion practice in Motive's patent infringement case are distinct from those for Samsara's patent case and Motive's non-patent causes of action.

Furthermore, Motive wrongly claims that the simplification factor requires *complete* simplification of *the entire case*. Opp. 6. The inquiry is whether a stay will simplify the issues that will be tried for the claims subject to IPR, not whether it eliminates the case. Courts have rejected the "all-or-nothing" view: "The issue is simplification, not elimination." *LBT IP II LLC v. Uber Techs. Inc.*, 2023 WL 322894, at *2 (N.D. Cal. Jan. 19, 2023); *Anderson Power Prods., Inc. v. BizLink Tech., Inc.*, 2025 WL 474906, at *2 (N.D. Cal. Feb. 12, 2025). Here, the IPRs will simplify by resolving or narrowing Motive's patent claims.

Finally, Motive's cited cases do not apply here. In *Space Data Corp. v. Alphabet Inc.*, this factor was neutral because the defendant moved to stay only one patent infringement claim, which the court found was "a relatively small portion of the overall case" and "numerous witnesses are set to appear [at trial in less than a year] irrespective of whether" that claim was stayed. 2019 WL 1131420, at *1-*3 (N.D. Cal. Mar. 12, 2019). Here, Samsara seeks a stay of Motive's entire patent case, which represents a significant part of the overall case and involves separate witnesses and evidence (including at least four expert witnesses). In *IMAX Corp. v. In-Three, Inc.*, the court explained that the patent claims sought to be stayed were "far too intertwined" with the other causes of action to make a partial stay "workable." 385 F. Supp. 2d 1030, 1033 n.2 (C.D. Cal. 2005). Here, however, the specific issues underlying Motive's patent infringement case are distinct from the rest of the case. In *Fulfillium, Inc. v. ReShape Medical, LLC*, the defendant moved to stay the entire case, including patent and non-patent causes of action, pending IPR. 2018 WL 9848044, at *2 (C.D. Cal. June 4, 2018), *vacated for lack of jurisdiction*, 2018 WL 7286379 (C.D. Cal. Sept. 28, 2018). The motion was denied because the IPRs would not impact the non-patent causes of action. Here, Samsara seeks a stay of only Motive's patent case.

ii. The PTAB Has Already Instituted IPR of the '580 Patent and Is Likely to Institute IPR of the '276 and '243 Patents

Although an IPR has already been instituted for the '580 patent, Motive disputes whether the PTAB will also institute review of the '276 and '243 patents. Motive's position fails for multiple reasons.

As an initial matter, as Samsara explained in its opening brief, it recognizes that this Court generally does not grant pre-institution stays. Br. 2. Even so, the unique facts and posture here justify

staying Motive's patent claims now because the only reason why the '276 and '243 IPRs have not yet reached an institution decision is because *Motive* chose to wait until this case was unstayed and then added them to this lawsuit—more than fifteen months after this suit was filed, nine months after the '243 patent issued (on August 13, 2024), and six months after the '276 patent issued (on November 5, 2024). Motive could have, but did not, file a new lawsuit asserting those patents after they issued. Thus, Motive should not now be permitted to use its own delay to its advantage where, without these two late-added patents, Motive would have no colorable basis to oppose a stay in view of the already-instituted '580 IPR.

In any event, Motive's assertion that the potential for simplification is speculative because only one IPR has been instituted to date overlooks that the PTAB's institution of the '580 IPR makes it highly likely that it will institute review of the '276 and '243 IPRs. In response, Motive first offers a blanket assertion that its three asserted patents all "claim different inventions." Opp. 8. But this assertion contradicts what Motive told the Court when it successfully argued that it should be permitted to add the '276 and '243 patents to this litigation. At that time, Motive repeatedly emphasized that "all three patents are directed to similar technologies" and "are directed to the same products." Dkt. No. 96 at 5, 8; *see also* Dkt. No. 104 at 7. Motive should not now be heard to say the PTAB's institution of one patent "says nothing about whether it will institute review" on another. Opp. 8.

The Court should reject Motive's attempts to sidestep Samsara's explanations about the likelihood of institution of the '276 and '243 IPRs by focusing on generalized PTO statistics. Motive's opposition simply ignores important, undeniable facts that contradict its position here, *e.g.*,: that the '276 patent is a continuation of the '580 patent for which an IPR has already been instituted, that the same primary reference is being used to challenge both patents; the notable fact that the Patent Office determined claim 1 of the '276 and '580 patents are "not patentably distinct" from each other during prosecution; that the '243 patent shares similar subject matter and inventors as the other two asserted patents; and that during prosecution the PTO never considered the art now presented in the '243 IPR. *See* Br. 2–6 (citing cases).[2]

Instead of addressing these case-specific facts, Motive relies on generalized statistics from the

[2] Motive relies on three cases for the proposition that stays before institution are disfavored, but none of those cases involve the facts here, where the PTAB has instituted one IPR, and the facts show (and the Patent Owner previously argued) that the two remaining patents are similar. *See* Opp. 7.

Patent Office, and only from a self-selected time frame. Those statistics, however, do not show the institution rates of patents that, like the ’276 and ’243 patents, issued recently or are related to already-instituted patents (*i.e.*, the ’580 patent). Here, the PTAB statistics and patent-specific details here support the view that the ’276 and ’243 IPR petitions are likely to be instituted and result in invalidation of at least some challenged claims. Br. 5; *see supra* Part I.A.ii. And as Motive itself acknowledges, “[s]uch broad PTAB statistics provide no basis for predicting case-specific outcomes.” Opp. 8.

Further, those statistics are incomplete because they are from a narrow time frame. For example, Motive relied only on statistics from October 2025 to argue that the institution rate for electrical/computer patents was 23%. Opp. 7. But the PTO released statistics for FY2026 covering both October 2025 and November 2025, and these statistics show that the institution rate for those two months combined for electrical/computer patents was 27%. Ex. 1. This means that in November 2025, the institution rate was approximately 30%, or nearly 35% higher than October’s institution rate. *Id.* Similarly, Motive asserts that only four IPR petitions have been instituted since Director Squires took office in September. Opp. 7–8. That is wrong. Motive ignores the several other instituted IPRs that Samsara identified, and that the Director has indeed continued to institute IPRs. Br. 6; IPR2025-01042, Paper 13 (December 11, 2025 decision instituting seven IPRs). At bottom, Motive’s generalized statistics do not undercut the specific reasons set forth in Samsara’s brief as to why institution is likely for the ’276 and ’243 IPRs.

B. The Case Is in Its Early Stages

The stage of this case favors a stay. While Motive is right that some discovery has occurred and early deadlines have been met, it cannot deny that “there is more work ahead of the parties and the Court than behind.” *X1 Discovery, Inc. v. Microsoft Corp.*, 2025 U.S. Dist. LEXIS 181732, at *7 (C.D. Cal. Sep. 16, 2025). The close of claim construction discovery is over two months from this motion (February 19, 2026), the *Markman* hearing is over four months away (April 16, 2026), and the close of fact discovery is over seven months away (July 24, 2026). Dkt. No. 115. Expert disclosures are not due until August 28, 2026, and the deadline for dispositive motions is over a year from now, on February 25, 2027. *Id.* Finally, trial is set for August 30, 2027—over 20 months away. *Id.* Courts routinely grant stays in cases like this, where the claim construction order has not yet issued and “costly expert discovery and dispositive motion practice” has not yet occurred. *See, e.g.*, *PersonalWeb Techs., LLC v. Apple Inc.*, 69 F. Supp. 3d

1022, 1025–26 (N.D. Cal. 2014) (citing cases); *Topia Tech., Inc. v. Dropbox Inc.*, 2023 WL 3437823, at *4 (N.D. Cal. May 12, 2023); *Anderson Power*, 2025 WL 474906, at *2 (factor favored stay because "[f]ar more work lies ahead for the litigants").

Instead of confronting the amount of work that still remains, Motive emphasizes how long this case has been pending. But courts "examine the posture and circumstances of each case on an individual basis," which focuses on what has or has not yet occurred in the litigation rather than simply the length of its pendency. *PersonalWeb*, 69 F. Supp. 3d at 1025–26; *see also Topia Tech.*, 2023 WL 3437823, at *4; *Google LLC v. EcoFactor, Inc.*, 2022 WL 6837715, at *2 (N.D. Cal. Oct. 11, 2022). Motive does not dispute that there is substantial work to be done in its patent infringement case. *See PersonalWeb*, 69 F. Supp. 3d at 1025–26. Motive also ignores that although the case has been pending since February 2024, it was stayed for nearly half of that time (from June 2024 to March 2025), during which Samsara filed its '580 IPR. Dkt. No. 81. Motive filed its Second Amended Complaint adding the '276 and '243 patents less than five months before Samsara filed this motion. Dkt. No. 107. And, when Motive sought leave to add those patents to this case, it argued that the case was in its early stages. It still is—indeed, much of the "motion practice and discovery" that Motive relies upon had already taken place by the time Motive moved for leave to amend its complaint. *See* Dkt. No. 90 at 1; Dkt. No. 96 at 6; Dkt. No. 96-1 ¶ 8.

Furthermore, Motive's delay arguments are factually wrong. *E.g.*, Opp. 5. Samsara timely filed its '580 IPR petition during the ten-month stay. Dkt. No. 81. The Board instituted Samsara's '580 IPR petition on August 27, 2025, and Samsara filed this motion promptly after its October 2025 and November 2025 IPR petitions on the newly added '276 and '243 patents, respectively. Br. 3.

Finally, Motive's cited cases do not move the needle in its favor. For example, *PersonalWeb* supports Samsara's position. There, the court found the stage of the case favored a stay, even where the litigation was further along than here (the parties had exchanged over 100 requests for production, produced over 500,000 pages, served over fifty interrogatories, and taken twelve depositions). 69 F. Supp. 3d at 1026. But the court nonetheless determined that "while much has been done, much remains, and the remaining work is costly," including expert reports, expert discovery, and dispositive motions. *Id.* By contrast, *Nike* and *Entangled Media* turned on materially different postures. In *Nike, Inc. v. Skechers U.S.A., Inc.*, no IPR had been instituted on *any* of the asserted patents, *and* the court expected the case to

be trial ready before any PTAB final decision. 2020 WL 8512299, at *1 (C.D. Cal. Dec. 30, 2020). Similarly, in *Entangled Media, LLC v. Dropbox, Inc.*, no IPR had been instituted on *any* of the asserted patents, the PTAB final decision would arrive about a month before trial, and one asserted patent had just emerged from an *ex parte* reexamination *confirming* the patentability of certain claims. 732 F. Supp. 3d 1120, 1122 (N.D. Cal. 2024). Here, the PTAB has already instituted the '580 IPR, the PTAB will issue a final written decision on the '580 patent nearly a year before the trial date, and as explained, the PTAB will likely institute review of the '243 and '276 patents, and those final written decisions would be issued at least three months before the trial. Dkt. No. 115. The stage of the case thus weighs in favor of a stay.

C. A Stay Will Not Unduly Prejudice Motive

Motive's arguments addressing the prejudice subfactors largely repackage its arguments for the other factors and similarly fail.

Timing of the Petitions for Review: Samsara did not delay in filing the IPRs. Motive concedes that Samsara filed the '276 and '243 IPRs within three and four months of those patents being added to the case. Opp. 10. Courts have regularly found that this timing does not amount to an undue delay. *See, e.g.*, *Anderson Power*, 2025 WL 474906, at *3 (no delay when IPR filed within seven months); *Sec. People, Inc. v. Ojmar US, LLC*, 2015 WL 3453780, at *4 (N.D. Cal. May 29, 2015).

As to the '580 IPR, Motive ignores that this case was stayed and Samsara still timely filed the '580 IPR. Indeed, none of Motive's cited cases involves a situation where a case was stayed and, for at least this reason, they are inapposite. Opp. 9–10. Second, the weight of the authority in this district is clear that an IPR filed within the statutory period "does not usually constitute undue prejudice because parties having protection under the patent statutory framework may not complain of the rights afforded to others by that same statutory framework." *GoPro, Inc. v. C&A Mktg., Inc.*, 2017 WL 2591268, at *5 (N.D. Cal. June 15, 2017) (quotations and citation omitted); *see, e.g.*, *DSS Tech. Mgmt., Inc. v. Apple, Inc.*, 2015 WL 1967878, at *4 (N.D. Cal. May 1, 2015) (citing cases).

Timing of the Request for Stay: Despite Samsara filing this motion within seven days of filing the last IPR, Motive argues that Samsara delayed in filing this motion because Motive initiated this action nearly twenty-two months ago. Opp. 10–11. Motive's argument ignores that this case was stayed for nearly half that time, and that the '276 and '243 IPRs were just added to this case in July. *Id*. Motive did

not cite a single case finding a motion filed promptly upon the filing of the last IPR constitutes undue delay. It does not. *AbCellera Biologics Inc. v. Berkeley Lights, Inc.*, 2021 WL 4499231, at *2 (N.D. Cal. Aug. 25, 2021) (two weeks between IPR and motion to stay did not weigh against stay); *NantWorks, LLC v. Niantic, Inc.*, 2021 WL 3473934, at *2 (N.D. Cal. July 15, 2021).

Status of Review Proceeding: Motive's argument concerning this factor—that a stay would be prejudicial because "only one out of six asserted patents has been instituted for IPR"—should be rejected. Opp. 11. Motive's patent case is separate and distinct from the rest of this litigation, and that *Motive* has not filed IPRs against *Samsara's* separately asserted patents is irrelevant to this factor. *See supra* Part II.A.i. Instead, this factor assesses, as it relates to the IPRs at issue (*i.e.*, Samara's IPRs against Motive's asserted patents), "whether the status of the IPR and EPR proceedings indicates that a stay would prejudice [plaintiff]." *Lyft, Inc. v. AGIS Software Dev. LLC*, 2022 WL 1592441, at *5 (N.D. Cal. May 19, 2022).

Here, the IPR proceedings favor a stay. The '580 IPR has been instituted. *Google LLC v. EcoFactor, Inc.*, 2024 WL 88003, at *4 (N.D. Cal. Jan. 8, 2024). While the '276 and '243 IPRs have not yet been instituted, by Motive's own admissions, the '276 and '243 patents involve substantially similar subject matter and therefore IPRs are likely to be instituted for those two patents. Dkt. No. 96 at 5; *see Lyft*, 2022 WL 1592441, at *5 (factor favors stay when some petitions had not yet been instituted but substantively identical petitions were previously instituted). And the reason the '276 and '243 IPRs have not yet been instituted is because of Motive's staggered assertion of those patents. Br. 9. Samsara should not be prejudiced because Motive asserted the '276 and '243 patents here instead of a separate case. *Id.*

Motive also argues that the length of any potential stay is prejudicial. Opp. 11. But "[c]ourts have repeatedly found no undue prejudice unless the patentee makes a specific showing of prejudice beyond the delay necessarily inherent in any stay." *Trusted Knight Corp. v. Int'l Bus. Machines Corp.*, 2020 WL 5107611, at *1 (N.D. Cal. Aug. 31, 2020) (citing cases). Here, Motive has only alleged prejudice associated with the delay inherent in any stay (*e.g.*, "timely enforcement of its patent rights"). Opp. 11; *see Relink US LLC v. Tesla Inc.*, 2025 WL 2909964, at *2 (N.D. Cal. Oct. 14, 2025); *Samsung Elecs. Co. v. Blaze Mobile, Inc.*, No. 5:21-CV-02989-EJD, 2023 WL 5418756, at *3 (N.D. Cal. Aug. 22, 2023).

Relationship of the Parties: Motive argues that the parties' status as competitors means this subfactor supports a finding of prejudice. Not so. While the parties are competitors in the fleet

management marketplace, this subfactor cannot change the overall balancing of the prejudice subfactors when all other subfactors weigh in favor of a stay. Br. 9. Motive's conduct also undermines any argument of "substantial" harm. Motive waited until the stay was lifted here to assert the '276 and '243 patents, rather than promptly filing a separate case after they issued. Opp. 11. Motive also did not seek a preliminary injunction and is seeking lost profits, which shows that Motive is not facing irreparable harm, and monetary damages can adequately compensate Motive for any alleged harm. *See, e.g.*, *X1 Discovery*, 2025 U.S. Dist. LEXIS 181732, at *12 (prejudice limited when "[patentee] has not moved for an injunction"); *Sonics, Inc. v. Arteris, Inc.*, 2013 WL 503091, at *4 (N.D. Cal. Feb. 8, 2013).

Motive also cannot show prejudice based on litigation costs. Opp. 12. It cites no case considering costs under this factor. *Id*. at 12–13.[3,4] And since Motive's patent case is distinct from the rest of this litigation, its assertion that a stay would increase its costs is unsupported. *Id*. at 12. A stay would likely reduce costs by allowing the parties to focus on the IPRs instead of two proceedings. *See supra* Part II.A[5]

Finally, Motive's cases show that its unsupported argument cannot create a showing of prejudice. Opp. 11–12. In *Avago Technologies Fiber IP (Singapore) Pte. Ltd. v. IPtronics Inc.*, the court stated that it "views skeptically the unsupported assertions of harm to reputation and goodwill." 2011 WL 3267768, at *5 (N.D. Cal. July 28, 2011) (only crediting arguments supported with evidence); *Asetek Holdings, Inc v. Cooler Master Co.*, 2014 WL 1350813, at *5 (N.D. Cal. Apr. 3, 2014) (same).[6] In sum, the totality of the prejudice subfactors favors a stay.

III. CONCLUSION

Thus, this Court should stay Motive's patent infringement claims pending final resolution of Samsara's IPR petitions concerning Motive's three asserted patents, including any related appeals.

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[3] *Space Data Corp.*, 2019 WL 1131420, at *7–8 (discussing simplification of issues); *IMAX*, 385 F. Supp. 2d at 1032–33 (same); *Fulfillium*, 2018 WL 9848044, at *2 (same).

[4] Motive cites *Technology Licensing v. Thomson, Inc.*, but it addressed a stay pending a state court contract case and applied the *Colorado River* factors. 684 F. Supp. 2d 1206, 1207–08 n.4 (E.D. Cal. 2010).

[5] Motive complains that a stay would reward Samsara's alleged delay in filing IPRs and punish Motive. Opp. 12. Motive, however, added the '276 and '243 patents after stating that Samsara would not be prejudiced, but now prejudices Samsara by opposing a stay based on those patents. *See supra* Part II.A.ii.

[6] Motive's remaining cited case is inapposite because it applies a different doctrine. *Bd. of Trs. of Leland Stanford Junior Univ. v. Stanford Fin. Grp. Co.*, 2009 WL 10700035, at *2 (N.D. Cal. Feb. 3, 2009).

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Respectfully submitted,

/s/ Josh Krevitt

Josh Krevitt (SBN 208552)
Brian A. Rosenthal (*Pro Hac Vice*)
Katherine Q. Dominguez (*Pro Hac Vice*)
Allen Kathir (*Pro Hac Vice*)
Allyson Parks (pro hac vice)
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035
JKrevitt@gibsondunn.com
BRosenthal@gibsondunn.com
KDominguez@gibsondunn.com
AKathir@gibsondunn.com
AParks@gibsondunn.com

Jaysen S. Chung (SBN 280708)
GIBSON, DUNN & CRUTCHER LLP
One Embarcadero Center Suite 2600
San Francisco, CA 94111-3715
Telephone: 415.393.8200
Facsimile: 415.393.8306
JSChung@gibsondunn.com

Stuart M. Rosenberg (SBN 239926)
srosenberg@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
310 University Avenue
Palo Alto, CA 94301
Telephone: 650.849.5300
Facsimile: 650.849.5333

Nathaniel R. Scharn (SBN 305836)
GIBSON, DUNN & CRUTCHER LLP
3161 Michelson Drive, Suite 1200
Irvine, CA 92612-4412
Telephone: 949.451.3800
Facsimile: 949.451.4220
nscharn@gibsondunn.com

Hannah L. Bedard (pro hac vice)
Wendy Cai (pro hac vice)
GIBSON, DUNN & CRUTCHER LLP
1700 M Street, N.W.
Washington, DC 20036-4504
Telephone: 202.955.8500
Facsimile: 202.467.0539
hbedard@gibsondunn.com
wcai@gibsondunn.com

Attorneys for Defendant and Counterclaim Plaintiff Samsara Inc.

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on December 24, 2025, with a copy of this document via electronic mail.

/s/ Josh Krevitt
Josh Krevitt