
From: Ogi Zivojnovic <ogizivojnovic@quinnemanuel.com>
Sent: Monday, December 29, 2025 7:55 PM
To: LS3_team@ls3ip.com; Sonos-CDCA0169-service
Cc: QE-Google-CDCA169-Tech
Subject: IPR2026-00131



Counsel,

Google has filed IPR2026-00131 challenging asserted U.S. Patent No. 10,966,025 (the '025 patent).

Consistent with *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020), Petitioner hereby stipulates that, if the Board institutes inter partes review in this proceeding, IPR2026-00131, Petitioner will not pursue in the related litigation, *Sonos, Inc. v. Google LLC*, No. 2:20-cv-00169 (C.D. Cal.), an invalidity defense based on any ground that was raised or reasonably could have been raised in this inter partes review before the Board with respect to U.S. Patent No. 10,966,025. Thus, there will be no “overlap between issues raised in the petition and in the parallel proceeding.” *Apple v. Fintiv*, IPR2020-00019, Paper 11 at 6 (PTAB Mar. 20, 2020).

To be clear, this stipulation does not extend to scenarios where the USPTO institutes but later vacates institution of IPR2026-00131, or otherwise terminates the IPR proceeding without issuing an appealable Final Written Decision, as those scenarios would no longer involve an instituted inter partes review. Thus, if IPR2026-00131 is not instituted, is instituted but later de-instituted, or otherwise terminates without an appealable Final Written Decision, Petitioner reserves the right to pursue in *Sonos, Inc. v. Google LLC*, No. 2:20-cv-00169 (C.D. Cal.) any ground that was raised or reasonably could have been raised in the IPR.

Regards,
Ogi