IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

MOSKOWITZ FAMILY LLC, Plaintiff, v. MEDTRONIC, INC., MEDTRONIC SOFAMOR DANEK, INC., MEDTRONIC SOFAMOR DANEK USA, INC., WARSAW ORTHOPEDIC, INC., and TITAN SPINE, INC., Defendants.	Case No. 25-cv-00769-PJS-DLM

NOTICE OF DEFENDANTS' SOTERA STIPULATION

On December 2, 2025, Defendant Medtronic, Inc. filed a Petition for *Inter Partes* Review ("IPR") of Claims 8, 9, 13, and 17-21 U.S. Patent No. 12,011,367. The Patent Trial and Appeal Board of the United States Patent and Trademark Office assigned the Petition AIA Review Number IPR2026-00162.

On December 1, 2025, Defendant Medtronic, Inc. filed a Petition for *Inter Partes* Review ("IPR") of Claims 9-12, 14-18, and 20 of U.S. Patent No. 11,376,136. The Patent Trial and Appeal Board of the United States Patent and Trademark Office assigned the Petition AIA Review Number IPR2026-00163.

Defendants Medtronic, Inc., Medtronic Sofamor Danek, Inc., Medtronic Sofamor Danek USA, Inc., Warsaw Orthopedic, Inc., and Titan Spine, Inc. ("Defendants") hereby notify the Court and the Plaintiff that Defendants are submitting the following *Sotera* stipulation in connection with IPR2026-00162 and IPR2026-0163. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020) ("Sotera") (describing the nature and

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purpose of a *Sotera* stipulation).

Stipulation for U.S. Patent No. 12,011,367 (IPR2026-00162)

Defendants hereby stipulate that if IPR2026-00162 is instituted (and is not subsequently dismissed or terminated), Defendants will not pursue in this litigation a counterclaim or defense that claims 8, 9, 13, and 17-21, which are the only claims challenged in IPR2026-00162, are invalid on any ground that Petitioner Medtronic, Inc. raised or reasonably could have raised in IPR2026-00162.

U.S. Patent No. 11,376,136 (IPR2026-00163)

Defendants hereby stipulate that if IPR2026-00121 is instituted (and is not subsequently dismissed or terminated), Defendants will not pursue in this litigation a counterclaim or defense that claims 19-12, 14-18, and 20, which are the only claims challenged in IPR2026-00163, are invalid on any ground that Petitioner Medtronic, Inc. raised or reasonably could have raised in IPR2026-00163.

Dated: February 2, 2026

/s/ X. Kevin Zhao

GREENE ESPEL PLLP

Sybil L. Dunlop, Reg. No. 0390186
X. Kevin Zhao, Reg. No. 0391302
Kshithij Shrinath, Reg. No. 0505164
222 S. Ninth Street, Suite 2200
Minneapolis, MN 55402
sdunlop@greeneespel.com
kzhao@greeneespel.com
kshrinath@greeneespel.com
(612) 373-0830

HUESTON HENNIGAN LLP

Moez M. Kaba (*Pro Hac Vice*)
Christina V. Rayburn *(Pro Hac Vice)*
Christine Woodin (*Pro Hac Vice*)
523 West 6th Street, Suite 400
Los Angeles, CA 90014
mkaba@hueston.com
crayburn@hueston.com
cwoodin@hueston.com
Telephone: 213 788 4340
Facsimile: 888 866 4825

Attorneys for Defendants Medtronic, Inc.; Medtronic Sofamor Danek, Inc.; Medtronic Sofamor Danek USA, Inc.; Warsaw Orthopedic, Inc.; and Titan Spine, Inc.