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Attorneys for Plaintiff Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

GOOGLE LLC,

Plaintiff,

v.

VALTRUS INNOVATIONS LTD. and
KEY PATENT INNOVATIONS LTD.,
Defendants.

Case No.: 3:26-cv-00363-TLT

**PLAINTIFF AND COUNTERCLAIM-
DEFENDANT GOOGLE LLC'S
STIPULATION REGARDING
INVALIDITY GROUNDS**

Judge: Trina L. Thomspson
Location: Courtroom 9, 19th Floor

HOGAN
LOVELLS US
LLP
ATTORNEYS AT LAW
SAN FRANCISCO

PLAINTIFF AND COUNTERCLAIM-DEFENDANT GOOGLE LLC'S STIPULATION REGARDING
INVALIDITY GROUNDS
CASE NO. 3:26-CV-00363-TLT

GOOGLE EXHIBIT 1024
Google LLC v. Valtrus Innovations Limited
IPR2026-00262

On February 17, 2026, Google LLC (“Google”) filed a petition for *inter partes* review for claims 14-21 and 25-28 of U.S. Patent No. 7,057,509 in IPR2026-00262.

GOOGLE HEREBY STIPULATES that if IPR2026-00262 is instituted (and institution is not subsequently vacated), Google will not pursue in this district court proceeding (*Google LLC v. Valtrus Innovations Ltd*, No. 3:26-cv-00363-TLT (N.D. Cal.)): (i) the specific grounds raised in IPR2026-00262, and (ii) any other ground that Google reasonably could have raised during the IPR (i.e., any ground that Petitioner reasonably could have raised under §§ 35 U.S.C. 102 or 103 on the basis of prior art patents or printed publications). Google plans to file a copy of this stipulation as an exhibit in IPR2026-00262.

IT IS SO STIPULATED.

Dated: May 26, 2026

Respectfully submitted,

By: /s/ David Perlson
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