GIBSON DUNN

Mark Reiter
Partner
T: +1 214.698.3360
mreiter@gibsondunn.com

April 30, 2026

VIA ELECTRONIC MAIL

Gareth DeWalt
Bunsow De Mory LLP
701 El Camino Real
Redwood City, CA 94063
gdewalt@bdiplaw.com

Re: *Carma Tech., Corp. et al. v. Uber Techs., Inc. et al.*, Case No. 2:25-cv-00029 (E.D. Tex.): Notice of *Sotera* Stipulation

Dear Counsel:

On March 12, 2026, Defendants Uber Technologies, Inc. and Uber Freight US LLC filed a Petition for *Inter Partes* Review of claims 1–5, 11, 12, and 15 of U.S. Patent No. 7,840,427. The Patent Trial and Appeal Board of the United States Patent and Trademark Office ("PTAB")) assigned the Petition AIA Review Number IPR2026-00305.

On March 12, 2026, Defendants Uber Technologies, Inc. and Uber Freight US LLC filed a Petition for *Inter Partes* Review of claims 1–4, 9–13, and 18 of U.S. Patent No. 10,916,138. The PTAB assigned the Petition AIA Review Number IPR2026-00306.

On March 12, 2026, Defendants Uber Technologies, Inc. and Uber Freight US LLC filed a Petition for *Inter Partes* Review of claims 1–5, 7, 10–15, 19, and 20 of U.S. Patent No. 11,164,456. The PTAB assigned the Petition AIA Review Number IPR2026-00307.

On March 12, 2026, Defendants Uber Technologies, Inc. and Uber Freight US LLC filed a Petition for *Inter Partes* Review of claims 1–20 of U.S. Patent No. 11,017,668. The PTAB assigned the Petition AIA Review Number IPR2026-00308.

On March 12, 2026, Defendants Uber Technologies, Inc. and Uber Freight US LLC filed a Petition for *Inter Partes* Review of claims 1, 2, 10–15, and 17–20 of U.S. Patent No. 10,741,071. The PTAB assigned the Petition AIA Review Number IPR2026-00309.

Defendants Uber Technologies, Inc., Uber Freight US LLC, and Uber Freight Holding Corporation ("Defendants") hereby notify Plaintiffs Carma Technology, Corp. and Carma Technology, Ltd. that Defendants are submitting the following *Sotera* stipulation in connection with IPR2026-00305, IPR2026-00306, IPR2026-00307, IPR2026-00308, and IPR2026-00309. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12, at 18–19 (PTAB Dec. 1, 2020) (describing the nature and purpose of a *Sotera* stipulation).

Stipulation for U.S. Patent No. 7,840,427 (IPR2026-00305)

Defendants hereby stipulate that if IPR2026-00305 is instituted, and is not subsequently dismissed or terminated, Defendants will not pursue in this litigation a counterclaim or defense that claims 1–5, 11, 12, and 15, which are the only claims challenged in IPR2026-00305, are invalid on any ground that Petitioner Uber Technologies, Inc. and Uber Freight US LLC raised or reasonably could have raised in IPR2026-00305.

Stipulation for U.S. Patent No. 10,916,138 (IPR2026-00306)

Defendants hereby stipulate that if IPR2026-00306 is instituted, and is not subsequently dismissed or terminated, Defendants will not pursue in this litigation a counterclaim or defense that claims 1–4, 9–13, and 18, which are the only claims challenged in IPR2026-00306, are invalid on any ground that Petitioner Uber Technologies, Inc. and Uber Freight US LLC raised or reasonably could have raised in IPR2026-00306.

Stipulation for U.S. Patent No. 11,164,456 (IPR2026-00307)

Defendants hereby stipulate that if IPR2026-00307 is instituted, and is not subsequently dismissed or terminated, Defendants will not pursue in this litigation a counterclaim or defense that claims 1–5, 7, 10–15, 19, and 20, which are the only claims challenged in IPR2026-00307, are invalid on any ground that Petitioner Uber Technologies, Inc. and Uber Freight US LLC raised or reasonably could have raised in IPR2026-00307.

Stipulation for U.S. Patent No. 11,017,668 (IPR2026-00308)

Defendants hereby stipulate that if IPR2026-00308 is instituted, and is not subsequently dismissed or terminated, Defendants will not pursue in this litigation a counterclaim or defense that claims 1–20, which are the only claims challenged in IPR2026-00308, are invalid on any ground that Petitioner Uber Technologies, Inc. and Uber Freight US LLC raised or reasonably could have raised in IPR2026-00308.

Stipulation for U.S. Patent No. 10,741,071 (IPR2026-00309)

Defendants hereby stipulate that if IPR2026-00309 is instituted, and is not subsequently dismissed or terminated, Defendants will not pursue in this litigation a counterclaim or defense that claims 1, 2, 10–15, and 17–20, which are the only claims challenged in IPR2026-00309, are invalid on any ground that Petitioner Uber Technologies, Inc. and Uber Freight US LLC raised or reasonably could have raised in IPR2026-00309.

Sincerely,

Mark N. Reiter