

Kenneth Darby

From: Kenneth Darby
Sent: Monday, May 04, 2026 12:30 PM
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Cc: Nicholas Stephens; Ryan Chowdhury; Rick Bisenius; IPR56407-0023IP1
Subject: Re: IPR2026-00327

Counsel,

As you know, Petitioner Okta, Inc. filed a petition for *inter partes* review against claims of U.S. Patent No. 12,254,103 (the “’103 patent”) on April 6, 2026, and that proceeding has been assigned AIA Review No. IPR2026-00327. If *inter partes* review is instituted in IPR2026-00327, unless institution is later vacated, reversed or otherwise de-instituted, Okta, Inc. stipulates to not pursue in any district court or ITC action against the ’103 patent, (i) the specific grounds raised in IPR2026-00327; (ii) any other ground that could have been reasonably raised in IPR2026-00327 under §§ 102 or 103 on the basis of prior art patents or printed publications; (iii) any ground based on a combination of system prior art (i.e., prior art that is neither a patent or printed publication) and the references that form the basis of any ground raised in IPR2026-00327, or (iv) any ground under §§ 102 or 103 on the basis of system art mirroring the references that form the basis of any ground raised in IPR2026-00327.

For the sake of clarity and to avoid any doubt, if the PTAB or Director declines to institute IPR2026-00327, or if institution is later vacated, reversed or otherwise de-instituted for any reason, Okta, Inc. reserves the right to assert any grounds of invalidity in any future proceeding against the ’103 patent.

Regards,

Kenneth Darby :: Principal :: Fish & Richardson P.C.
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Counsel for Petitioner Okta, Inc.