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Re: *Bluestone Ventures Inc. v. Google LLC*, No. 7:25-cv-00569-DC-DTG

Dear Ray:

I'm writing to let you know that Google is filing an IPR petition (IPR2026-00418) challenging claims 1–7 and 9–15 of asserted U.S. Patent No. 11,473,925 (the “’925 patent”) and offers the following *Sotera* stipulation in support of its petition. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (PTAB Dec. 1, 2020).

Google hereby stipulates that, if the PTAB institutes an IPR proceeding on the grounds presented in Google’s petition challenging claims 1–7 and 9–15 of the ’925 patent, Google will not pursue in this district court litigation the same grounds in the petition or any grounds that reasonably could have been raised during the IPR (i.e., any ground that reasonably could have been raised under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications) with respect to the patent claims subjected to the instituted IPR.

Google’s *Sotera* stipulation above is not intended and should not be construed to limit Google’s ability to assert invalidity of any claims of the asserted patents in this litigation based on any other ground. If the PTAB denies institution or institutes and later vacates institution of

Raymond W. Mort, III
July 30, 2026
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the IPR proceeding, Google reserves the right to pursue in this litigation any ground that was raised or reasonably could have been raised in the IPR.

Best Regards,

A handwritten signature in black ink, appearing to read "Ad-Kwon", with a stylized flourish at the end.

Adam W. Kwon

cc: All Counsel of Record