

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS
AMERICA, INC., SAMSUNG SEMICONDUCTOR, INC., and SAMSUNG
AUSTIN SEMICONDUCTOR LLC.,
Petitioner,

v.

W&WSENS DEVICES INC.,
Patent Owner.

Case PGR2025-00082
U.S. Patent No. 12,243,948

PETITIONER'S *SOTERA* STIPULATION

Consistent with *Sotera Wireless, Inc.*, Petitioner hereby stipulates “that if the PTAB institutes [PGR], Petitioner ‘will not pursue in [*W&Wsens Devices Inc. v. Samsung Electronics Co., Ltd., et al.*, Case No. 2:24-cv-00854-JRG (E.D. Tex.)] the specific grounds [asserted in PGR2025-00082], or . . . any other ground . . . that was raised or could have been reasonably raised in a [PGR]” (i.e., “any ground that could be raised under paragraph (2) or (3) of section 282(b) (relating to invalidity of the patent or any claim’’)). *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential as to § II.A); 35 U.S.C. § 321(b).

Respectfully submitted,

Dated: October 6, 2025

By: /Joshua L. Goldberg/
Joshua L. Goldberg, Reg. No. 59,369
Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **Petitioner's Sotera Stipulation** was served electronically via email on October 6, 2025, in its entirety on the following:

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Patent Owner has consented to service by email.

Dated: October 6, 2025

/Lisa C. Hines/

Lisa C. Hines
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