



LG Display Stipulation

LG Display Co., Ltd. (“Petitioner” or “LG Display”) filed a petition for *post grant review* (PGR2026-00028) with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims 1-8 of U.S. Patent No. 12,293,691. LG Display hereby stipulates that, if the PTAB institutes and maintains institution of review in PGR2026-00028, LG Display will not pursue in co-pending District Court litigation the specific invalidity grounds asserted in PGR2026-00028, or any other ground that could have been reasonably raised in PGR2026-00028. *See Sotera Wireless, Inc. v. Masimo Corporation*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). In so stipulating, LG Display seeks to avoid multiple proceedings in different forums addressing the validity of the instituted claims based on the same grounds or prior art. For the sake of clarity and to avoid any doubt, if the PTAB declines to institute (or withdraws institution of) PGR2026-00028, the conditions supporting the above stipulation will be unmet and the stipulation is null and void.

Respectfully submitted,

/Jeremy J. Monaldo/

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