IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HYUNDAI MOTOR AMERICA INC.
Petitioner,

v.

GERM DOME INDUSTRIES LLC
Patent Owner.

Case No. PGR 2026-00030
U.S. Patent No. 12,296,061

PETITIONER'S STIPULATION

Consistent with *Sotera Wireless, Inc.*, Petitioner Hyundai Motor America Inc. ("Petitioner") hereby stipulates that if the PTAB institutes trial in this PGR, unless institution is later vacated, reversed, or otherwise withdrawn, Petitioner and any real party in interest or privy of the Petitioner "will not pursue in [*Germ Dome Industries LLC v. Hyundai Motor America*, No: 8:25-cv-02593 (C.D. Cal.)] the specific grounds [asserted in PGR2026-00030], 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) (internal quotations omitted); 35 U.S.C. § 321(b).

Dated: April 21, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on April 21, 2026 the foregoing document was served via email on the following counsel of record:

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