

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TANKLOGIX, LLC,
Petitioner v.

SITEPRO, INC.,
Patent Owner

Case No. IPR 2025-00647

U.S. Patent No. 9,898,014

PETITIONER'S *SOTERA* STIPULATION

Consistent with *Sotera Wireless, Inc.*, Petitioner hereby stipulates “that if the PTAB institutes *inter partes* review, Petitioner ‘will not pursue in [*SitePro, Inc. v. TankLogix, LLC*, No. 6:24-cv-00642; -643 (W.D. Tex.) (“Litigation”)] the specific grounds [asserted in IPR2025-00647], or . . . any other ground . . . that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications).” *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB Dec. 1, 2020) (precedential). For the avoidance of doubt, if the PTAB institutes *inter partes* review, Petitioner will not, in the Litigation, rely on any product or system art that is “based on the same evidence presented” in this IPR. *Cf. SAP America, Inc. v Cyandia, Inc.*, IPR2024-01496, Paper 13 at 9 (PTAB Apr. 7, 2025).

Dated: May 15, 2025

Respectfully submitted,

By: /Robert D. Katz/
Robert D. Katz
Reg. No. 60,704
Katz PLLC
8350 N. Central Expressway
Suite 1900
Dallas, TX 75206
214-865-8000
rkatz@katzfirm.com

**ATTORNEY FOR PETITIONER
TANKLOGIX**

CERTIFICATE OF SERVICE

I hereby certify that the PETITIONER'S SOTERA STIPULATION was served, by consent of the parties, by emailing a copy thereof to counsel of record for the Patent Owner on May 15, 2025 by filing the documents through P-TACTS and by sending via electronic mail to the following:

Babak Tehranchi
Reg. No. 55,937
PERKINS COIE LLP
11452 El Camino Real, Ste. 300
San Diego, CA 92130
Tel: 858.720.5700
Fax: 858.720.5799
tehranchi-ptab@perkinscoie.com

M. Craig Tyler
Reg. No. 41,519
PERKINS COIE LLP
405 Colorado Street, Ste 1700
Austin, TX 78701
Tel: 737.256.6100
Fax: 737.256.6300
tyler-ptab@perkinscoie.com

Fareid Asphahani
Reg. No. 72,217
PERKINS COIE LLP
11452 El Camino Real, Ste. 300
San Diego, CA 92130
Tel: 858.720.5700
Fax: 858.720.5799
asphahani-ptab@perkinscoie.com

Matthew Lutz
Reg. No. 82,142
PERKINS COIE LLP
2525 E. Camelback Road, Ste. 500
Phoenix, AZ 85016
Tel: 602.351.8000
Fax: 602.351.7000
lutz-ptab@perkinscoie.com

Dated: May 15, 2025

Respectfully Submitted,

/ Robert D. Katz /
Robert D. Katz (Reg. No. 60,704)