

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WALMART INC. and WALMART STORES TEXAS, LLC
Petitioners

v.

RAVENWHITE SECURITY, INC.,
Patent Owner

Case: IPR2025-00810
U.S. Patent No. 10,594,823

PETITIONERS' REVISED *SOTERA* STIPULATION

In accordance with the Board's precedential decision in *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020), Petitioners Walmart Inc. and Walmart Stores Texas, LLC stipulate that if the Board institutes inter partes review in this proceeding, IPR2025-00810, Petitioners will not pursue in the parallel district court proceeding, *RavenWhite Licensing LLC v. Walmart Inc. et al.*, 2:24-cv-00688 (EDTX) (Lead Case) or 2:24-cv-00689 (EDTX) (Member Case), the same grounds as in the petition or any grounds that could have reasonably been raised in the petition. Petitioner hereby further stipulates that if the Board enters a decision instituting reexamination and this IPR proceeds, Petitioner will not assert in the related district court proceeding any § 103 defense based on a combination of any system prior art with any prior art raised in the Petition. Thus, there will be *no* overlap between the issues raised in the Petition and the district court, and this IPR will serve as a "true alternative" to the district court proceeding.

Date: June 13, 2025

Respectfully submitted,

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Counsel for Petitioners Walmart Inc.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 13, 2025, a copy of the foregoing Petitioners' *Sotera* Stipulation has been served via electronic mail upon the following, who has agreed to accept service on behalf of Patent Owner:

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and, by email, upon counsel of record for the Patent Owner in the litigation before the United States District Court for the Eastern District of Texas:

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