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EDWARD BENNETT WILLIAMS (1920-1988)  
PAUL R. CONNOLLY (1922-1978)

July 21, 2025

Via Email

Daniel H. Shulman  
VedderPrice  
222 North LaSalle Street  
Chicago, Illinois 60601  
[dshulman@vedderprice.com](mailto:dshulman@vedderprice.com)

Re: IPR2025-00967, IPR2025-00968

Dear Dan,

As you know, Google has filed IPR petitions challenging all claims of asserted U.S. Patent Nos. 10,445,683 (“’683 patent”) (IPR2025-00967) and 11,037,090 (“’090 patent”) (IPR2025-00968). Google offers the following *Sotera* stipulation in support of its petitions. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020).

Google hereby stipulates that, if the PTAB institutes an IPR proceeding on the grounds presented in Google’s petitions challenging the claims of the ’683 patent and/or ’090 patent, Google will not pursue in this district court litigation the same grounds in the petition or any grounds that reasonably could have been raised during the IPR with respect to the patent claims subjected to the instituted IPR (*i.e.*, any ground that reasonably could have been raised under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications).

Google’s *Sotera* stipulation above is not intended and should not be construed to limit Google’s ability to assert invalidity of any claims of the asserted patents in this litigation based on any other ground. If the PTAB denies institution or institutes and later vacates institution of either IPR proceeding, Google reserves the right to pursue in this litigation any ground that was raised or reasonably could have been raised in that IPR.

Google Exhibit 1036 Google v. Bootler IPR2025-00968
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Sincerely,

A handwritten signature in blue ink, appearing to read 'A. P. Maurer', with a long horizontal flourish extending to the right.

Aaron P. Maurer