

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GRANITE VEHICLE VENTURES LLC,

Plaintiff,

v.

TESLA, INC.,

Defendant.

Civil Action No. 2:24-cv-01007-JRG

JURY TRIAL DEMANDED

**NOTICE OF BROADENED SOTERA PLUS
STIPULATION OF DEFENDANT TESLA, INC.**

Defendant Tesla, Inc. (“Defendant”) filed petitions for *Inter Partes* Review (“IPR”) of all the patents in this proceeding (Civil Action No. 2:24-cv-01007-JRG, hereinafter “Proceeding”) with the Patent Trial and Appeal Board of the United States Patent and Trademark Office (the “PTAB”). The following table identifies two of the IPR proceedings for one of the patents in this Proceeding, the date the IPR petitions were filed, the patent involved in the IPR proceedings, and the claims challenged in each of the two IPR proceedings. The claims challenged in the two IPR proceedings include all the claims of the corresponding patent that are asserted against Defendant in this Proceeding.

IPR No.	Patent No.	IPR Petition Filed	Claims Challenged
IPR2025-01034	U.S. 12,037,004	May 28, 2025	1-9, 29-39
IPR2025-01035	U.S. 12,037,004	May 28, 2025	10-24, 27

Defendant hereby notifies the Court and Plaintiff that Defendant is submitting the following broadened *Sotera* stipulation (“Broadened *Sotera* Plus stipulation”) in connection with IPR2025-001034 and IPR2025-01035 identified in the table above. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (PTAB Dec. 1, 2020) (“*Sotera*”) (describing the standard, unbroadened *Sotera* stipulation).

Stipulation for U.S. Patent No. 12,037,004 (IPR2025-01034)

Defendant hereby provides its stipulation before this Court in view of the concurrent IPR (IPR2025-01034) against Plaintiff’s U.S. Patent No. 12,037,004 filed before the PTAB. If the PTAB institutes an IPR (and does not subsequently vacate institution) in response to Defendant’s Petition, Defendant stipulates for this Proceeding and against the ’004 Patent that it will not raise or pursue (i) the specific grounds raised in IPR2025-01034, (ii) any other grounds that could have reasonably been raised before the PTAB in instituted IPR2025-01034 (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of only prior art patents or printed publications), or (iii) any ground based on a combination of system prior art and the references asserted as part of a ground raised in IPR2025-01034, as reflected in the table summarizing the Statutory Grounds for Challenges on page 2–4 of the Petition. Defendant further stipulates that if the PTAB institutes an IPR (and does not subsequently vacate institution), it will only pursue in this Proceeding and against the ’004 Patent grounds based solely on system prior art or system prior art in combination with one or more of the following references:

Name	U.S. Patent No.
Debouk	U.S. Patent No. 8,618,922
Fields	U.S. Patent No. 11,175,660
Fung	U.S. Patent No. 9,751,534
Dolgov	U.S. Patent No. 8,874,305
Prokhorov	U.S. Pat. Pub. No. 2016/0252903
Konrardy	U.S. Patent No. 10,185,998
Stenneth	U.S. Pat. Pub. No. 2015/0314780

Scofield	U.S. Patent No. 11,040,725
Zhu	U.S. Pat. Pub. No. 2014/0336935

Stipulation for U.S. Patent No. 12,037,004 (IPR2025-01035)

Defendant hereby provides its stipulation before this Court in view of the concurrent IPR (IPR2025-01035) against Plaintiff's U.S. Patent No. 12,037,004 filed before the PTAB. If the PTAB institutes an IPR (and does not subsequently vacate institution) in response to Defendant's Petition, Defendant stipulates for this Proceeding and against the '004 Patent that it will not raise or pursue (i) the specific grounds raised in IPR2025-01035, (ii) any other grounds that could have reasonably been raised before the PTAB in instituted IPR2025-01035 (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of only prior art patents or printed publications), or (iii) any ground based on a combination of system prior art and the references asserted as part of a ground raised in IPR2025-01035, as reflected in the table summarizing the Statutory Grounds for Challenges on page 2–3 of the Petition. Defendant further stipulates that if the PTAB institutes an IPR (and does not subsequently vacate institution), it will only pursue in this Proceeding and against the '004 Patent grounds based solely on system prior art or system prior art in combination with one or more of the following references:

Name	U.S. Patent No.
Debouk	U.S. Patent No. 8,618,922
Fields	U.S. Patent No. 11,175,660
Fung	U.S. Patent No. 9,751,534
Dolgov	U.S. Patent No. 8,874,305
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Scofield	U.S. Patent No. 11,040,725
Zhu	U.S. Pat. Pub. No. 2014/0336935

Defendant's Broadened *Sotera* Plus stipulations above are not intended and should not be construed to limit Defendant's ability to assert invalidity of any claims of the patents-at-issue in this lawsuit based on any other ground beyond those grounds identified in 35 U.S.C. § 311(b).

Dated: August 19, 2025

Respectfully Submitted,

/s/ Ashraf Fawzy

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record who have appeared in these cases are being served today with a copy of the foregoing via the Court's CM/ECF system.

Dated: August 19, 2025

/s/ Ashraf Fawzy
Ashraf Fawzy