

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SMART DENTURE CONVERSIONS, LLC,)
)
 Plaintiff,)
)
 v.) C.A. No. 24-507-JCB
)
 STRAUMANN USA, LLC,)
)
 Defendant.)

**DEFENDANT STRAUMANN USA, LLC’S NOTICE OF *SOTERA* STIPULATION
REGARDING U.S. PATENT NO. 12,156,781**

On June 4, 2025, Defendant Straumann USA, LLC (“Straumann”) filed a petition for Post Grant Review (“PGR”), PGR2025-00054, with the Patent Trial and Appeal Board of the United States Patent and Trademark Office (“PTAB”), challenging all claims (1-16) of U.S. Patent No. 12,156,781 (“’781 patent”), one of the two patents asserted in this litigation. Straumann was named as Petitioner and a real party-in-interest in the PGR petition.

Straumann hereby notifies the Court and Plaintiff Smart Denture Conversions, LLC (“SDC”) that Straumann is submitting the following “*Sotera* stipulation” in support of its petition in PGR2025-00054. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (PTAB Dec. 1, 2020) (“*Sotera*”). Straumann similarly previously filed with the Court its Notice of *Sotera* Stipulation concerning the *inter partes* review of U.S. Patent No. 11,937,992 (IPR2025-00956), the other patent asserted in this litigation, on June 4, 2025 (D.I. 57).

Straumann hereby stipulates, consistent with the stipulation made by Petitioner in *Sotera*, that, if the PTAB institutes a PGR in response to Straumann’s petition against SDC’s ’781 patent (PGR2025-00054), Straumann will not pursue in this litigation that the patent claims subject to the

instituted PGR are invalid based on grounds that were raised or reasonably could have been raised during the PGR.

Straumann's *Sotera* stipulation above is not intended and should not be construed to limit Straumann's ability to assert invalidity of any claims of the '781 patent based on any other ground.

Respectfully submitted,

/s/ Nathan R. Hoeschen

Karen E. Keller (No. 4489)

Nathan R. Hoeschen (No. 6232)

SHAW KELLER LLP

I.M. Pei Building

1105 North Market Street, 12th Floor

Wilmington, DE 19801

(302) 298-0700

kkeller@shawkeller.com

nhoeschen@shawkeller.com

Attorneys for Defendant

OF COUNSEL:

Georg Reitboeck

Mark Chapman

HAUG PARTNERS LLP

745 Fifth Avenue

New York, NY 10151

(212) 588-0800

Christopher Gosselin

HAUG PARTNERS LLP

1717 K Street NW, Suite 900

Washington, DC 20006

(212) 588-0800

Dated: July 15, 2025