

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC
Petitioner

v.

K.MIZRA LLC
Patent Owner

Case No. IPR2025-01437
Patent 9,516,048

PETITIONER'S *SOTERA* STIPULATION

Consistent with *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020), Petitioner hereby stipulates that, if the Board institutes *inter partes* review in this proceeding, IPR2025-01437, Petitioner will not pursue in the related litigation, *K.Mizra LLC v. Google LLC*, Civ. Action No. 1:25-cv-00236 (W.D. Tex.) (“the ’236 Litigation”), an invalidity defense based on any ground that was raised or reasonably could have been raised in this *inter partes* review before the Board with respect to U.S. Patent No. 9,516,048. Thus, there will be no “overlap between issues raised in the petition and in the parallel proceeding.” *Apple v. Fintiv*, IPR2020-00019, Paper 11 at 6 (PTAB Mar. 20, 2020).

If the Board denies institution, or institutes and later vacates institution of IPR2025-01437, or otherwise terminates the proceeding without maintaining a Final Written Decision pursuant to 35 U.S.C. § 318(a), Petitioner reserves the right to pursue in the ’236 Litigation, any ground that was raised or reasonably could have been raised in IPR2025-01437.

Date: November 21, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 21st day of November, 2025, a true and correct copy of the foregoing **PETITIONER'S *SOTERA* STIPULATION** is being served upon Patent Owner's counsel via electronic as follows:

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