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Sent: Friday, October 17, 2025 3:44 AM
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Subject: [EXTERNAL] Samsung v. SnapAid, IPR2025-01521

Re *Sotera+ Stipulation re SnapAid, Ltd. v. Samsung Electronics Co., Ltd. et al.*, No. 2-25-cv-00378 (E.D. Tex.)

Dear Counsel:

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (together, “Samsung”) stipulate—on terms broader than those *Sotera Wireless Inc. v. Masimo Corp.*, IPR2020-01019, that if the Patent Trial and Appeal Board (“PTAB”) institutes inter partes review (“IPR”) in response to Samsung’s petition challenging the patentability of claims 1-20 of U.S. Patent No. 11,252,325 (IPR2025-01521), then Samsung will not pursue in the above-referenced litigation: (i) the specific grounds raised in IPR2025-01521; (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of 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 IPR2025-01521.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-01521, Samsung reserves the right to assert any grounds of invalidity for the ’325 Patent in the above litigation, including grounds within the scope of (i) – (iii) above.

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