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Cc: Appleby, Robert A.
Subject: [EXTERNAL] Samsung v. SnapAid, PGR2025-00083

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, consistent with the stipulation made by the petitioner in *Sotera Wireless Inc. v. Masimo Corp.*, IPR2020-01019, that if the Patent Trial and Appeal Board ("PTAB") institutes post-grant review ("PGR") in response to Samsung's petition challenging the patentability of claims 1-12 of U.S. Patent No. 12,250,452 (PGR2025-00083), then Samsung will not pursue in the above-referenced litigation any ground of invalidity that was raised or reasonably could have been raised before the PTAB in the instituted PGR proceeding.

Furthermore, for the sake of clarity, if the PTAB declines to institute PGR2025-00083, Samsung reserves the right to assert any grounds of invalidity for the '452 Patent in the above litigation, including those that were raised or reasonably could have been raised in the petition for PGR.

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