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Subject: IPR2026-00020 ('001 Patent), IPR2025-01590 ('715 Patent), IPR2026-00021 ('014 Patent) – Sotera Stipulations
Date: Friday, November 28, 2025 10:56:00 AM
Attachments: [shield-advisory.png](#)
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External email

Counsel,

Google has filed IPR2026-00020 challenging asserted U.S. Patent No. 10,541,883 (the “’001 patent”), IPR2026-00021 challenging asserted U.S. Patent No. 7,571,014 (the “’014 patent”), and IPR2025-01590 challenging asserted U.S. Patent No. 10,031,715 (the “’715 patent”) and offers the following *Sotera* stipulation in support of each petition. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18–19 (PTAB Dec. 1, 2020).

Petitioner stipulates that, if the Board institutes IPR, Petitioner will not pursue in *Sonos, Inc. v. Google LLC*, No. 2:20-cv-00169 (C.D. Cal.), an invalidity defense based on any ground that was raised or reasonably could have been raised in the IPR. *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12, 18-19 (PTAB Dec. 1, 2020) (precedential as to §II.A). If the Board denies institution or institutes and later vacates institution, Petitioner reserves the right to pursue in *Sonos*, No. 2:20-cv-00169 any ground that was raised or reasonably could have been raised in the IPR.

Google’s *Sotera* stipulation above is not intended and should not be construed to limit Google’s ability to assert invalidity of any claims of the asserted patents in this litigation based on any other ground.

Best regards,
Ogi