

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSARA INC.  
Petitioner

v.

MOTIVE TECHNOLOGIES, INC.  
Patent Owner

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Case IPR2026-00034  
U.S. Patent No. 12,136,276

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**PETITIONER'S STIPULATION  
REGARDING 35 U.S.C. § 315(E)(2)**

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Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-145

**I. STIPULATION**

If the Board institutes this IPR, Petitioner will not raise in district court (*Motive Techs. Inc. f/k/a Keep Truckin, Inc. v. Samsara Inc.*, No. 3:24-cv-00902 (N.D. Cal)) any grounds raised or that reasonably could have been raised in the Petition or any grounds that are combinations of the prior art asserted in this IPR with unpublished system prior art. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (P.T.A.B. Dec. 1, 2020) (precedential as to II.A); *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, Paper 19 at 4 (P.T.A.B. Mar. 28, 2025).

Respectfully submitted,

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Date: November 17, 2025

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**CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))**

The undersigned hereby certifies that the foregoing **PETITIONER'S STIPULATION REGARDING 35 U.S.C. § 315(E)(2)** was served electronically via e-mail on November 17, 2025, in its entirety on the following counsel of record for Patent Owner:

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