

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM SERVICES LLC,
Petitioner,

v.

SMART SPEAKER LLC,
Patent Owner.

Patent No. 11,190,590

Inter Partes Review No. IPR2026-00148

NOTICE OF PETITIONER'S STIPULATION

Amazon.com Services LLC (“Petitioner”) hereby stipulates that, if this proceeding is instituted, Petitioner will be bound by the full scope of estoppel under 35 U.S.C. § 315(e)(2) in the related litigation action, *Smart Speaker LLC v. Amazon.com Services LLC*, No. 2-25-cv-00707 (E.D. Tex.), as of the institution decision date for the patent at issue in this proceeding (*i.e.*, Petitioner will forgo invalidity in district court based on “any ground that the petitioner raised or reasonably could have raised during that inter partes review”). *See also Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12, 18-19 (PTAB Dec. 1, 2020) (precedential as to § II.A).

Accordingly, this stipulation ensures that this proceeding would be a “true alternative” to the district court proceeding (*Sotera*, Paper 12, 18-19) because Petitioner agrees not to pursue any grounds after institution in the district court that are within the scope of the statutory estoppel (*i.e.*, any grounds that the statute would preclude Petitioner from pursuing after Final Written Decision for example if the district court were to stay the IPR pending Final Written Decision). However, if institution of this proceeding is subsequently vacated or if this proceeding is terminated after institution without reaching a Final Written Decision, Petitioner will no longer be bound by this stipulation.

IPR2026-00148
Patent No. 11,190,590

Dated: December 26, 2025

By: /s/ Alex S. Yap
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Certificate of Service (37 C.F.R. § 42.6(e)(4))

I hereby certify that the attached NOTICE OF PETITIONER'S
STIPULATION was served as of the below date via email (by consent) to the
following counsel of record for the Patent Owner:

Peter Lambrianakos
Vincent J. Rubino, III
Clark Gordon
Ryan F. Oliver
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Dated: December 26, 2025

/s/ Alex S. Yap
Alex S. Yap