
Subject: Hafeman v. LG Electronics Inc., No. 6:21-cv-696-ADA-DTG (W.D. Tex.) - Sotera Stipulation
Date: Wednesday, November 30, 2022 at 11:16:50 AM Eastern Standard Time
From: Singh, Tej
To: Lawrence Hadley, Jason Linger, Genevieve Vose Wallace, Max Tribble, Krisina Zuniga, Tom DelRosario, Kalpana Srinivasan, Dan Duhaime, cmcandrew@glaserweil.com
CC: Crowson, Celine J., Gambhir, Nitin, Stoll-DeBell, Kirstin L., Beyer, Carrie, Silverstein, Brianna L., Brzezynski, Lora A., Kirsten Elfstrand, J. Stephen Ravel, Michael Jones, Shaun Hassett

Counsel -

Google and Microsoft have filed petitions for *inter partes* review against the three Hafeman patents asserted in this case and identified LG Electronics Inc. as a real party-in-interest.

As you know, LG Electronics Inc. is the only defendant in *Hafeman v. LG Electronics, Inc.* (Case No. 6:21-cv-00696-ADA-DTG), and the deadline to add parties was on June 8, 2022. In accordance with the Board's precedential decision in *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020), LG Electronics Inc. agrees that if any of IPR Nos. IPR2022-01188, IPR2022-01189, IPR2022-01190, IPR2022-01191, IPR2022-01192, and IPR2022-01193 is instituted, LG Electronics Inc. will not pursue in the related district court proceeding "any ground that [Google or Microsoft] raised or reasonably could have raised" during the instituted IPRs. 35 U.S.C. § 315(e).

Best regards,
Tej

Tej Singh | Counsel | Hogan Lovells US LLP | tej.singh@hoganlovells.com | + 1 650 463 4152