



A *Sotera* stipulation, named after *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, is a binding representation by the petitioner that, if the PTAB institutes review, the petitioner will not pursue any invalidity grounds in the district court litigation that could have been raised in the IPR. In effect, it functions as a broad waiver of all grounds that were raised or reasonably could have been raised before the Board, thereby eliminating redundancy between proceedings and addressing the PTAB's concerns about duplicative litigation and inefficient use of judicial resources.