

1 Peter S. Veregge (SBN 155,769)  
2 *peter@cislo.com*  
3 CISLO & THOMAS LLP  
4 2829 Townsgate Road, Suite 330  
5 Westlake Village, CA 91361  
6 Telephone: 805-496-1164  
7 Telefax: 805-435-8446

8 Michael N. Rader (admitted *pro hac vice*)  
9 *mrader@wolfgreenfield.com*  
10 WOLF, GREENFIELD & SACKS, P.C.  
11 605 Third Avenue, 25th Floor  
12 New York, NY 10158  
13 212.697.7890 Phone | 617.646.8646 Fax

14 *Counsel for Defendants Sony Group  
15 Corporation, Sony Corporation  
16 of America, Sony Interactive Entertainment  
17 LLC, Sony Pictures Entertainment Inc.,  
18 and Sony Electronics Inc.*

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MZ AUDIO SCIENCES, LLC,

Plaintiff,

v.

SONY GROUP CORPORATION  
(JAPAN), SONY CORPORATION OF  
AMERICA, SONY INTERACTIVE  
ENTERTAINMENT LLC, SONY  
PICTURES ENTERTAINMENT INC.,  
and SONY ELECTRONICS INC.,

Defendants.

Case No. 2:22-cv-00866 AB (PDx)

**DEFENDANTS' *SOTERA*  
WIRELESS STIPULATION  
REGARDING INVALIDITY  
CONTENTIONS**

Case File # 1057

1 Defendants Sony Group Corporation, Sony Corporation of America, Sony  
2 Interactive Entertainment LLC, Sony Pictures Entertainment Inc., and Sony  
3 Electronics Inc. (collectively, “Defendants” or “Sony”) submit this stipulation  
4 regarding invalidity contentions.

5 On September 23, 2022, Sony filed petition number IPR2022-01544 with  
6 the Patent Trial and Appeal Board (“PTAB”) requesting *inter partes* review  
7 (“IPR”) of U.S. Patent No. 7,289,961 (“the ’961 patent”). Petition IPR2022-01544  
8 asserts the following three grounds of unpatentability:

IPR Ground	Claims	Grounds of Unpatentability
1	1-10	Obviousness under 35 U.S.C. § 103 over U.S. Patent No. 6,272,176 (“Srinivasan”), in view of Richard C. Cabot et al., “Detection of phase shifts in harmonically related tones,” in <i>Journal of the Audio Engineering Society</i> , vol. 24, no. 7, pp. 568-571 (Sept. 1976) (“Cabot”), and in further view of PCT Publication No. WO 01/58063 (“Kudumakis”).
2	2-3, 5, 7-8, 10	Obviousness under 35 U.S.C. § 103 over Srinivasan, in view of Cabot, and in further view of Kudumakis and U.S. Patent No. 6,633,653 (“Hobson”).
3	1-10	Obviousness under 35 U.S.C. § 103 over Kudumakis, in view of John F. Tilki et al., “Encoding a hidden auxiliary channel onto a digital audio signal using psychoacoustic masking,” in <i>Proceedings IEEE SOUTHEASTCON ’97. ‘Engineering the New Century,’</i> pp. 331-333 (1997) (“Tilki”), and in further view of Cabot.

23 Sony hereby stipulates that if the PTAB institutes IPR2022-01544, then  
24 Sony will not argue in this case that the claims of the ’961 patent are invalid in  
25 view of the grounds Sony either raised or could reasonably have raised in  
26 IPR2022-01544.

1 Dated: September 23, 2022 By: /s/ Michael N. Rader

2 Peter S. Veregge  
3 CISLO & THOMAS LLP  
4 2829 Townsgate Road, Suite 330  
5 Westlake Village, CA 91361  
6 805.496.1164 | 805.435.8446 Fax

7 Michael N. Rader (admitted *pro hac vice*)  
8 *mrader@wolfgreenfield.com*  
9 WOLF, GREENFIELD & SACKS, P.C.  
10 605 Third Avenue, 25th Floor  
11 New York, NY 10158  
12 212.697.7890 Phone | 617.646.8646 Fax

13 Randy J. Pritzker (admitted *pro hac vice*)  
14 *rpritzker@wolfgreenfield.com*  
15 Charles T. Steenburg (admitted *pro hac vice*)  
16 *csteenburg@wolfgreenfield.com*  
17 Alexandra K. Kim (admitted *pro hac vice*)  
18 *akim@wolfgreenfield.com*  
19 Jie Xiang (admitted *pro hac vice*)  
20 *jxiang@wolfgreenfield.com*  
21 WOLF, GREENFIELD & SACKS, P.C.  
22 600 Atlantic Avenue  
23 Boston, MA 02210  
24 617.646.8000 Phone | 617.646.8646 Fax

25 *Counsel for Defendants Sony Group*  
26 *Corporation, Sony Corporation of*  
27 *America, Sony Interactive Entertainment*  
28 *LLC, Sony Pictures Entertainment Inc., and*  
*Sony Electronics Inc.*