

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CLOVER NETWORK, LLC

Petitioner

v.

CLOUDOFCHANGE, LLC

Patent Owner

IPR2023-00288

U.S. Patent No. 10,083,012

PETITIONER'S STIPULATION

Pursuant to the Board's authorization, given during the Conference Call on March 27, 2023, Defendant Clover Network, LLC ("Clover") stipulates that if this IPR is instituted and *Fintiv* remains precedential at the time of institution, Clover stipulates not to pursue in the district court any ground raised or that could have reasonably been raised in this IPR (i.e., under §§ 102 or 103 based on prior art patents or printed publications alone). The stipulation provided herein is identical to the stipulation provided in the corresponding Lightspeed IPR (IPR2022-00997).

Further pursuant to the Board's authorization, Clover stipulates that if this IPR is instituted and Clover's Motion for Joinder of IPR2022-00997 is granted, Clover stipulates to be bound by the opinions and testimony of Lightspeed's declarant, Stephen Gray, including the deposition testimony given on December 21, 2022, and any subsequent declarations or depositions provided by Mr. Gray in the corresponding Lightspeed IPR (IPR2022-00997).

Respectfully submitted,

Dated: March 29, 2023

By: /Jason Kipnis/

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CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2023, I caused a true and correct copy of the foregoing “PETITIONER’S STIPULATION” to be served via electronic service by email to the email addresses provided below:

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