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RE: *Parus Holdings, Inc., v. Google, LLC.*, Case No. 6:21-cv-00571-ADA (W.D. Tex.) and
IPR2022-00805

Counsel:

We represent Google in the above referenced matters. We write to inform you that Google, LLC (“Google” or “Petitioner”), hereby stipulates that if the PTAB institutes inter partes review no. IPR2022-00805 (filed against U.S. Patent 9,769,314, the ‘314 patent), then Petitioner will not pursue invalidity against the asserted claims of the ‘314 patent in the District Court proceeding captioned above using any obviousness ground which includes the primary reference in that petition, referred to therein as “Wise.” Petitioner reserves the right to present invalidity in District Court on other bases.

To be clear, this stipulation does not encompass any arguments regarding the proper priority date or dates of alleged invention of the ‘314 patent claims. Accordingly, Petitioner reserves the right to make arguments regarding the priority date of the ‘314 patent. This stipulation does not apply to any claims other than the ‘314 patent claims challenged in the above-captioned IPR, nor does it apply to any claims of any other patent. Additionally, the primary reference identified above may be included in Google’s invalidity contentions to preserve its rights in the event that the above-captioned IPR does not go forward.

Thank you for your attention to these matters.

Sincerely,

/s/ Ben Haber

Ben Haber, Counsel for Google