From: Ko, Jonathan L.
To: "C. Matthew Rozier"; Travis Lynch; Jonathan Hardt; Jonathan Miller; Jim McDonough
Cc: Kelly, Adam G.; "Jon Thielbar"; Neu, Abby M.; "lionel.lavenue@finnegan.com"; "R.Maxwell.Mauldin@finnegan.com"; "Andrew.Schneider@finnegan.com"; "R.Benjamin.Cassady@finnegan.com"; "Kara.Specht@finnegan.com"; "Matthew.Karas@finnegan.com"
Subject: LATL v. Marriott - Case No. 2:22-cv-00318-JRG (E.D. Tex.)
Date: Tuesday, October 3, 2023 3:20:00 PM

Counsel,

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), Marriott International, Inc. ("Marriott") agrees that if IPR Nos. IPR2023-00815, IPR2023-00816, and IPR2023-00817 are instituted, Marriott will not pursue any ground that ASSA ABLOY Global Solutions, Inc. and HID Global Corp. raised or reasonably could have raised during the IPRs in the district court proceeding, *Liberty Access Technologies Licensing LLC v. Marriott International, Inc.*, 2:22-cv-00318-JRG (E.D. Tex.). 35 U.S.C. § 315(d).

Regards,

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ASSA ABLOY-HID EXHIBIT 1022
ASSA ABLOY-HID v. LIBERTY
IPR2023-00816

From: Lavenue, Lionel
To: Jim McDonough; C. Matthew Rozier; Jonathan Miller; Travis Lynch; Jonathan Miller
Cc: Karas, Matthew; Schneider, Andrew; Schulz, Bradford; Specht, Kara; Mauldin, R. Maxwell
Subject: IPRS2023-815, -816, -817; Sotera Stipulation
Date: Tuesday, October 3, 2023 5:49:20 PM
Attachments: image002.png

Counsel:

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), ASSA ABLOY AB, ASSA ABLOY Mobile Services AB, ASSA ABLOY Global Solutions AB, ASSA ABLOY Global Solutions, Inc., and HID Global Corp. agree that, if IPR Nos. IPR2023-00815, IPR2023-00816, and IPR2023-00817 are instituted, they will not pursue "any ground that [they] raised or reasonably could have raised" during the IPRs in the related district court proceeding, *Liberty Access Technologies Licensing LLC v. ASSA ABLOY AB et al.*, 2:22-cv-00507 (E.D. Tex.), *ASSA ABLOY Global Solutions, Inc. v. Liberty Access Technologies Licensing LLC*, 1:23-cv-00756 (N.D. Ill.). 35 U.S.C. § 315(d).

Regards,

Lionel

Lionel M. Lavenue | Bio
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