

May 4, 2023

VIA E-MAIL

Anthony K. Bruster
Shawn A. Latchford
Andrew J. Wright
BRUSTER PLLC
680 North Carroll Avenue, Suite 110
Southlake, Texas 76092

Steven E. Tiller
Gregory M. Stone
WHITEFORD TAYLOR PRESTON LLP
Seven St. Paul Street
Baltimore, MD 21202

Michael B. Angelovich
Nicholas A. Wyss
NIX PATTERSON LLP
3600 North Capital of Texas Highway
Suite B350
Austin, Texas 78746

Karl Rupp
SOREY & HOOVER, LLP
100 N. 6th Street, Suite 502
Waco, TX 76701

Re: *Auto Telematics Ltd. v. United Services Automobile Association*, Case No.
6:22-cv-00474

Counsel:

We write regarding the petitions for *inter partes* review (IPR) that are being filed today against U.S. Patent No. 10,198,879, in the above-captioned litigation. I write to inform you that United Services Automobile Association (“USAA”) hereby stipulates that if the Patent Trial and Appeal Board (PTAB) institutes the IPR petition filed in IPR2023-00858 on the grounds presented within that petition, then USAA will not seek resolution in the district court of any ground of invalidity that utilizes US Pat. Appl. Pub. No. 2011/0307188 (“Peng”), U.S. Pat. Appl. Pub. No. 2010/0131691 (“Chatterjee”), European Pat. App. Pub. No. EP 1,914,691 (“Katayama”), U.S. Patent No. 7,821,421 (“Tamir”), U.S. Patent No. 6,073,004 (“Balachandran”), U.S. Patent Application Publication No. 2010/0216509A1 (“Riemer”), or U.S. Patent Application Publication No. 2008/0255888 (“Berkobin”).

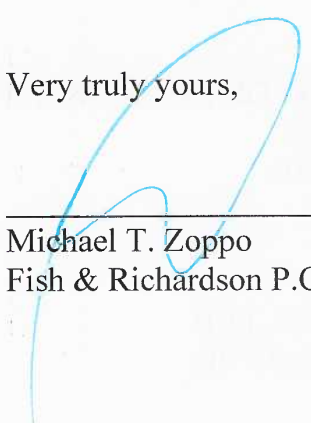


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In so stipulating, USAA seeks to avoid multiple proceedings in different forums addressing the validity of the '879 patent based on any of the same prior art references. Rather, consistent with Congressional intent, USAA wishes the patentability of this patent over the prior art references applied in IPR2023-00857, IPR2023-00858, and IPR2023-00859 to be addressed at the PTAB.

Very truly yours,



Michael T. Zoppo
Fish & Richardson P.C.