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May 11, 2023

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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. 9,311,271, 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 IPR2023-00911 on the grounds presented within that petition, then USAA will not seek resolution in the district court of any ground of invalidity that utilizes International Publication No. WO 2010/042545 ("Curry"), U.S. Pat. No. 8,682,399 ("Rabu"), U.S. Patent No. 7,821,421 ("Tamir"), European Pat. App. Pub. No. EP 1,914,691 ("Katayama"), U.S. Patent Pub. No. 2009/0024419 ("McClellan"), and International Pub. No. WO 2010/062899 ("Callopy").

In so stipulating, USAA seeks to avoid multiple proceedings in different forums addressing the validity of the '271 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 IPR2023-00911 and IPR2023-00912 to be addressed at the PTAB.

Very truly yours,

Michael T. Zoppo
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