

October 30, 2023

Glen E. Summers (glen.summers@bartlitbeck.com)  
Bartlit Beck LLP  
1801 Wewatta Street, Suite 1200  
Denver, CO 80202

Re: *General Access Solutions, Ltd. v. Cellco Partnership D/B/A Verizon Wireless*,  
C.A. No. 2:22-00394-JRG (E.D. Tex.)

Dear Mr. Summers:

Verizon hereby stipulates that if the Patent Trial and Appeal Board (“PTAB”) institutes an IPR in response to Verizon’s petition against General Access Solutions’ U.S. Patent No. 7,230,931 (IPR2023-00978), then Verizon will not pursue in this litigation the grounds raised in that petition for IPR or any other grounds that could have reasonably been raised before the PTAB in that proceeding.

Sincerely,



Kate Dominguez