From: Lavenue, Lionel
Sent: Friday, September 22, 2023 3:03 PM
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Cc: BMW-NorthStar-IPRs
Subject: IPR2023-00890, IPR2023-01017, and IPR2023-00934

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), BMW AG agrees that if IPR Nos. IPR2023-00890, IPR2023-01017, and IPR2023-00934 are instituted, BMW AG will not pursue "any ground that [BMW] raised or reasonably could have raised" during the IPRs in the related district court proceeding, *NorthStar Systems LLC v. Bayerische Motoren Werke AG*, No. 2-22-cv-00495 (Dec. 27, 2022, EDTX). 35 U.S.C. § 315(d).

Regards,

Lionel

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"Practice Group of the Year" *Law360,* 2017, 2019, 2022
"Intimidating Opponent: The Most Feared Firms in Litigation" *BTI Consulting Group Litigation Outlook*, 2022, 2023
"#1 Tier National Ranking for Intellectual Property Litigation" *Benchmark Litigation,* 2022
"U.S. PTAB Firm of the Year" *Managing Intellectual Property Americas IP Awards*, 2019, 2021, 2022

BMW EXHIBIT 1021
BMW v. NORTHSTAR
IPR2023-01017