

January 11, 2024

Sarah E. Piepmeier
SPiepmeier@perkinscoie.com
D. +1.415.344.7150
F. +1.415.344.7350

VIA EMAIL

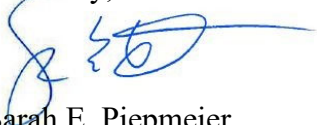
Kevin C. Wheeler
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington DC 20004
kevin.wheeler@lw.com

Re: *AX Wireless v. Lenovo Group Ltd.*, Case No. 22-cv-00280-RWS-RSP (E.D. Tex.)

Dear Counsel:

Lenovo Group Ltd. (“Lenovo”) hereby stipulates, consistent with the stipulation made by the Petitioner in *Sotera Wireless Inc. v. Masimo Corp.*, IPR202-01019, that if the Patent Trial and Appeal Board (“PTAB”) institutes an *inter partes* review (“IPR”) in response to Intel’s petition against AX Wireless, U.S. Patent No. 11,212,146 (IPR2023-01145 and IPR2023-01146), then Lenovo will not pursue in this litigation the grounds raised or any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding.

Sincerely,



Sarah E. Piepmeier