From: Burke, Katharine
To: Jason Engel PTAB; Allor, Katherine; Hubbard, Nolan R.; Richey, Samuel P.; KLG-STA-Motorola
Cc: DL BBMSISTA; DL_BB_STA_MSI_IPRs
Subject: IPR2023-01292 ("802 patent)
Date: Wednesday, December 27, 2023 6:30:56 PM

Counsel,

Motorola Solutions, Inc. stipulates that, if the Patent Trial and Appeal Board institutes an IPR proceeding for U.S. Patent No. 7,324,802 on the grounds presented in the petition in IPR2023-01292, Motorola Solutions, Inc. will not pursue an invalidity defense in the district court action (*STA Group LLC v. Motorola Solutions, Inc.*, Case No. 2:22-cv-00381 (E.D. Tex.)) that the patent claims subject to the instituted IPR are invalid based on grounds that were raised or reasonably could have been raised in the IPR.

Regards,
Kate

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