

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DYNAPASS IP HOLDINGS LLC,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

Case No. 2:23-CV-00063-JRG-RSP
(LEAD CASE)

DYNAPASS IP HOLDINGS LLC,

Plaintiff,

v.

EXPERIAN INFORMATION SERVICES,
INC.,

Defendant.

Case No. 2:23-CV-00066-JRG-RSP
(MEMBER CASE)

DEFENDANT’S STIPULATION REGARDING INVALIDITY CONTENTIONS

Defendant Experian Information Solutions, Inc. (“Experian” or “Defendant”) submits this stipulation regarding invalidity contentions.

Experian intends to file petition number IPR2023-01406 (the “Petition”) with the Patent Trial and Appeal Board (the “Board”) requesting *inter partes* review (“IPR”) of U.S. Patent No. 6,993,658 (the “’658 Patent”). The Petition asserts the following grounds of invalidity:

Ground	Claims	Basis of Unpatentability
1	1-7	Obvious under 35 U.S.C. § 103 over PCT Publication No. WO 97/31306 in view of U.S. Patent No. 6,173,400.

Experian hereby stipulates that if the Board institutes IPR in IPR2023-01406, Experian will not pursue in this case the specific grounds identified above in connection with the

referenced patent and claims as originally issued on the instituted IPR Petition, or any other ground for the '658 Patent for which the Board institutes that was raised or reasonably could have been raised in an IPR.

This stipulation is not intended, and should not be construed, to limit Experian's ability to assert invalidity of the asserted claims of the '658 Patent, in this case on any other ground (e.g., invalidity under §§ 102 or 103 based on any product prior art, or under §§ 101 or 112), regardless of whether IPR is instituted, and Experian expressly reserves all rights thereto.

Dated: September 27, 2023

Respectfully submitted,

By: /s/ R. Scott Feldmann

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*Counsel for Defendant Experian
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CERTIFICATE OF SERVICE

I certify that on September 27, 2023, a copy of the foregoing document, DEFENDANT'S STIPULATION REGARDING INVALIDITY CONTENTIONS, was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record.

/s/ R. Scott Feldmann
R. Scott Feldmann