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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ALMONDNET, INC. and INTENT IQ, LLC,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 22-cv-08911-JST
Case No. 23-cv-00438-JST

**JOINT STIPULATION TO STAY AND
~~PROPOSED~~ ORDER**

COOLEY LLP
ATTORNEYS AT LAW
PALO ALTO

**JOINT STIPULATION TO STAY
CASE NOS. 23-CV-00438-JST & 22-CV-08911-JST**

Pursuant to Local Rule 7-12, Plaintiffs AlmondNet, Inc. and Intent IQ, LLC (collectively, “AlmondNet”) and Defendant Meta Platforms, Inc. (“Meta”) respectfully submit the following joint stipulation to stay the above-captioned actions, subject to the Court’s approval. A proposed order is submitted herewith.

WHEREAS, AlmondNet asserted thirteen patents against Meta across the two above-captioned cases, including six patents currently pending in Case No. 22-cv-08911-JST (“*AlmondNet I*”) and six patents currently pending in Case No. 23-cv-00438-JST (“*AlmondNet II*”);

WHEREAS, the parties have concurrently stipulated to dismiss six asserted patents across the two pending cases to resolve Meta’s pending Motion to Dismiss *AlmondNet II*;

WHEREAS, after the Court’s approval of the stipulation to dismiss six asserted patents, only six of the twelve currently asserted patents will remain at issue in *AlmondNet I* and *AlmondNet II* (unshaded patents will be dismissed):

<i>AlmondNet I</i>	<i>AlmondNet II</i>
8,244,586 – dismissed	7,979,307 – dismissed
8,677,398 – dismissed	8,776,249 – dismissed
9,830,615	7,747,745 – dismissed
8,671,139	8,204,783 – dismissed
8,244,582	8,959,146
7,822,639	10,715,878

WHEREAS, the Patent Trial and Appeal Board has issued decisions instituting IPR on two of the six remaining patents: IPR2022-01064 against U.S. Patent No. 9,830,615, filed May 31, 2022 and instituted November 30, 2022; and (2) IPR2022-01436 against U.S. Patent No. 8,244,582 filed August 19, 2022 and instituted April 7, 2023.

WHEREAS, Meta intends to file an *inter partes* review petition against U.S. Patent No. 10,715,878;

WHEREAS, the parties agree that good cause exists to stay the above-captioned actions to conserve resources and promote judicial economy for the Court and the parties;

WHEREAS, AlmondNet and Meta have conferred and agreed, subject to the Court’s approval, that:

- The above-captioned actions are both stayed, and all currently scheduled dates are vacated;
- The stay will continue until at least the latest of:
 - (1) the final written decision in all IPRs filed as of April 6, 2023 against any patents asserted in the above-captioned actions, including without limitation the two pending, instituted IPRs: IPR2022-01064 against U.S. Patent No. 9,830,615 and IPR2022-01436 against U.S. Patent No. 8,244,582;
 - (2) the institution decision of any IPRs filed within four months of April 6, 2023; or
 - (3) the final written decision of any IPRs filed within four months of April 6, 2023 that become instituted during the pendency of the stay;

NOW, THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE TO request an order from the Court to stay the proceedings and vacate all currently scheduled dates in the above captioned actions, until at least the latest of (1) the final written decision in all IPRs filed as of April 6, 2023 against any patents asserted in the above-captioned actions, including without limitation the two pending, instituted IPRs: IPR2022-01064 against U.S. Patent No. 9,830,615 and IPR2022-01436 against U.S. Patent No. 8,244,582; (2) the institution decision of any IPRs filed within four months of April 6, 2023; or (3) the final written decision of any IPRs filed within four months of April 6, 2023 that become instituted during the pendency of the stay.

Dated: April 11, 2023

Respectfully submitted,

/s/ Reza Mirzaie

By: /s/ Heidi L. Keefe

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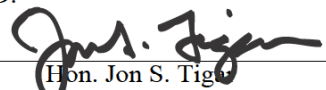
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PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: April 12, 2023


Hon. Jon S. Tighe
United States District Judge