

September 26, 2024

VIA E-MAIL

Marc Fenster
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025

Re: Headwater Research LLC v. Cellco Partnership d/b/a Verizon Wireless, et al., No. 23-cv-00352 (E.D. Tex.)

Dear Marc:

Defendants Cellco Partnership d/b/a Verizon Wireless and Verizon Corporate Services Group, Inc. (collectively, “Verizon”) hereby stipulate that if the Patent Trial and Appeal Board institutes an IPR in response to Verizon’s petition against Headwater Research LLC’s U.S. Patent No. 9,198,042 (IPR2024-00809), then Verizon will not pursue invalidity challenges in this litigation on the grounds or the prior art references asserted in that petition for IPR.

Sincerely,

/s/ Katherine Q. Dominguez

Katherine Q. Dominguez