

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. T-Mobile USA, Inc., et al., No. 23-cv-00379, -377*
(E.D. Tex.)

Dear Marc:

Defendants T-Mobile USA, Inc. and Sprint LLC (collectively, “T-Mobile”) hereby stipulate that if the Patent Trial and Appeal Board institutes an IPR in response to T-Mobile’s petition against Headwater Research LLC’s U.S. Patent No. 9,198,042 (IPR2024-00809), then T-Mobile 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