

October 17, 2024

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VIA EMAIL

Hao Tan
Arch & Lake LLP
203 N. LaSalle St., Ste. 2100
Chicago, IL 60601

Re: *Hanshow Tech. Co., Ltd. et al. v. SES-imagotag SA et al.*, Case No. 2:23-cv-00617; *VusionGroup SA v. Hanshow Tech. Co.*, IPR2024-00963

Dear Hao:

In connection with IPR2024-00963, Petitioner VusionGroup SA (“VusionGroup”) hereby stipulates and agrees that if the PTAB institutes an *inter partes* review proceeding (“IPR”) for U.S. Patent No. 10,701,321 on the grounds presented in VusionGroup’s petition, VusionGroup will not pursue an invalidity defense in *Hanshow Tech. Co., Ltd. et al. v. SES-imagotag SA et al.*, Case No. 2:23-cv-00617 (E.D. Tex.) that the patent claims subject to the instituted IPR are invalid based on the same grounds as in the petition or any grounds that could have reasonably been raised in the petition. This stipulation is limited to the grounds in the petition and those that could have reasonably been raised in the petition and is not intended to—and should not be construed to—limit VusionGroup’s ability to assert invalidity of any claims of the ’321 patent on any other ground.

Very truly yours,



Grant E. Kinsel