From:	High, Robert
To:	Christopher E. Hanba; SDaniels@dickinson-wright.com; JJones@dickinson-wright.com; AVaughan@dickinson-wright.com; APellegrino@dickinsonwright.com; lemerson@dickinsonwright.com; msaunders@dickinsonwright.com; batkinson@dickinsonwright.com
Cc:	Panitch, Gerson; Schlesinger, Benjamin; Bell, Cory; Bazrod, Wyatt; Mobileye-Facet
Subject:	Stipulation of Mobileye Vision Technologies, Ltd. and Mobileye Inc.
Date:	Thursday, February 6, 2025 8:34:33 PM

Counsel,

Mobileye Vision Technologies, Ltd. and Mobileye, Inc. hereby stipulate that if the Patent Trial and Appeal Board institutes an IPR on the petition for IPR in IPR2024-01110, Mobileye Vision Technologies, Ltd. and Mobileye, Inc. will not pursue in *Facet Technology Corp. v. Mobileye Global, Inc.*, 2:24-cv-00058-RWS-RSP (EDTX) ("EDTX Litigation"), any ground that Mobileye Global, Inc. raised or reasonably could have raised during that proceeding. Similarly, Mobileye Vision Technologies, Ltd. and Mobileye, Inc. hereby stipulate that if the Patent Trial and Appeal Board institutes an IPR on the petition for IPR in IPR2024-01111, Mobileye Vision Technologies, Ltd. and Mobileye, Inc. will not pursue in the EDTX Litigation any ground that Mobileye Global, Inc. raised or reasonably could have raised during that proceeding.

If Mobileye Vision Technologies, Ltd. and Mobileye, Inc. are added to the EDTX Litigation, these stipulations are not intended to limit their ability to assert invalidity of the asserted claims of the '255 and '328 patents on any other ground, including grounds under §§ 101 or 112 or grounds under §§ 102 or 103 that rely on prior art that could not have reasonably been raised during the IPRs (e.g., prior art that is neither a patent nor printed publication). If Mobileye Vision Technologies, Ltd. and Mobileye, Inc. are not added to the EDTX Litigation, they reserve all rights to pursue invalidity of the asserted claims of the '255 and '328 patents on any ground.

Regards,
Bob High

Bob High
Partner
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
271 17th Street, NW, Suite 1400, Atlanta, GA 30363-6209
404.653.6564 | fax 404.653.6444 | **robert.high@finnegan.com** | www.finnegan.com

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