

Stipulation

Re: *Stellar, LLC v. Motorola Solutions, Inc., et al, No. 4-23-cv-750-SDJ*

If the USPTO Director is unwilling to grant institution or reinstate the *inter partes* review (“IPR”) proceedings listed below absent an expanded stipulation broader than the *Sotera* stipulation previously presented in EX1043, then Motorola Solutions, Inc. and Watchguard Video, Inc. (“Motorola”) hereby further stipulate:

- for each IPR listed below, if the IPR is instituted or reinstated at the Patent Trial and Appeal Board (“PTAB”), then Motorola will not pursue in the above-captioned litigation (EDTX 4:23-cv-750-SDJ) as to the challenged claims any prior art invalidity grounds, including invalidity grounds based on any system prior art alone or any system prior art in combination with any patents or printed publications.
 - IPR2024-01205, challenging claims 1-20 of U.S. Patent No. 7,593,034
 - IPR2024-01206, challenging claims 1-13 of U.S. Patent No. 9,485,471
 - IPR2024-01207, challenging claims 1-22 of U.S. Patent No. 8,692,882
 - IPR2024-01208, challenging claims 1-23 of U.S. Patent No. 9,912,914

To avoid any doubt, for each of the IPR proceedings listed above, if institution is declined, then Motorola reserves the right to pursue the grounds of the denied petition or any other prior art invalidity grounds in the parallel litigation.

On behalf of Motorola,

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