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Via E-Mail (bfarnan@farnanlaw.com)

Brian Farnan
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**Re: *Intellectual Ventures I LLC v. Ubiquiti, Inc.*,
Case No. 1:23-cv-00865-JLH (D. Del.)**

Dear Counsel:

Ubiquiti Inc. has filed an *inter partes* review (IPR) petition (IPR2024-01290) with the Patent Trial and Appeal Board (PTAB) to address the validity of claims 1–8 and 11–42 of U.S. Patent No. 8,594,122 (“the ’122 Patent”).

I write to inform you that Ubiquiti hereby stipulates that if the PTAB institutes IPR2024-01290, Ubiquiti agrees not to pursue any grounds raised in the petition, or any grounds Ubiquiti could have reasonably raised in the petition, in this district court litigation or any parallel proceeding. *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2024-01290, Ubiquiti reserves the right to assert any grounds of invalidity in the District Court proceedings against the ’122 Patent.

Sincerely,

/s/ David Conrad

David Conrad
Principal

cc: Michael J. Farnan (mfarnan@farnanlaw.com)
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