

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SPORTSCASTR INC.
(d/b/a PANDA INTERACTIVE),

Plaintiff,

v.
GENIUS SPORTS LTD.,

Defendant.

Civil Action No. 2:23-cv-471-JRG

GENIUS SPORTS' STIPULATION RE *INTER PARTES* REVIEW

On [Date], the Patent Trial and Appeal Board instituted *inter partes* review (“IPR”) of U.S. Patent No[s]. [REDACTED]. Defendant Genius Sports hereby stipulates that, from and after the date of this stipulation, it will not pursue a defense in this Action that the aforementioned asserted patent[s] [is/are] invalid based on grounds that were raised or reasonably could have been raised in Defendant’s IPR petitions.

Dated: _____

Jeanne M. Heffernan
James John Lomeo
KIRKLAND & ELLIS LLP
401 Congress Avenue
Austin, TX 78701
(512) 678-9100
jheffernan@kirkland.com
james.lomeo@kirkland.com

Joshua L. Simmons (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
(212) 446-4800
joshua.simmons@kirkland.com

Patrick Arnett (admitted *pro hac vice*)
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 389-5000
patrick.arnett@kirkland.com

Attorneys for Defendant Genius Sports Ltd.