Kilpatrick Townsend & Stockton LLP
ktslaw.com

Suite 2800, 1100 Peachtree Street NE
Atlanta, GA 30309-4528

Joshua H. Lee
direct dial 404 815 6582
direct fax 404 541 3252
jlee@ktslaw.com

March 10, 2025

By Email

Brett Cooper
BC Law Group P.C.
200 Madison Avenue, 24th Floor
New York, NY 10016
bcooper@bclgpc.com

Re: *Universal Connectivity Technologies Inc. v. Lenovo Group Limited*, Case No. 2:23-cv-00449-JRG (E.D. Tex.)

Counsel:

Lenovo (United States) Inc., among others, has filed an *inter partes* review (IPR) petition (IPR2024-01429) with the Patent Trial and Appeal Board (PTAB) to address the unpatentability of claims 1, 2, 6, 7, 23, 25, 31, 53, 68, 70, 71, 72, 74, and 75 ("the Challenged Claims") of U.S. Patent No. 7,187,307 ("the '307 Patent"). The table in attached Appendix A lists the grounds and references asserted in IPR2024-01429.

I write to inform you that Defendant Lenovo Group Limited hereby stipulates, in the above-captioned litigation, that if IPR is instituted in IPR2024-01429, then:

> Defendant Lenovo Group Limited will not pursue in District Court litigation the specific grounds asserted in inter partes review IPR2024-01429, or on any other ground that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patents or printed publications).

See Sotera Wireless, Inc. v. Masimo Corporation, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020) (precedential); Board's e-mail to the parties dated March 3, 2025 (IPR2024-01429).

This language is the same as that set forth in the Board's e-mail dated March 3, 2025, authorizing submission of such a stipulation to the Board with respect to IPR2024-01429.

Pursuant to *Sotera*, Defendant Lenovo Group Limited reserves the right to assert grounds in the above-captioned litigation based on any art not comprised solely of patents and printed

publications, including system art, either alone, or in combination with other prior art.[1] For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2024-01429, Defendant Lenovo Group Limited reserves the right to assert any grounds of invalidity in the above-captioned litigation against the ’307 Patent.

Regards,

/s/ Joshua H. Lee
Joshua H. Lee

cc: Counsel of Record

[1] Defendant Lenovo Group Limited notes that system art is not eligible for PTAB consideration in an IPR proceeding, and grounds based on system art either alone, or in combination with patent or printed publication prior art, could not have reasonably been raised before the PTAB in the IPR petition. *See* 35 U.S.C. § 311(b). Further, discovery in the above-captioned litigation is currently ongoing and Defendant Lenovo Group Limited expects there to be additional materials and/or testimony relating to system art. For the avoidance of doubt, Defendant Lenovo Group Limited reserves the right to rely on such forthcoming productions in the above-captioned litigation.

Appendix A – Grounds and Prior Art References

Ground	Patent Claims	Basis
1	1, 2, 6, 7, 53	35 U.S.C. § 102; these claims are anticipated by U.S. Patent No. 5,974,464 (Shin)
2	1, 2, 6, 7, 53	35 U.S.C. § 103; these claims are obvious over Shin
3	1, 2, 6, 7, 23, 25, 31, 53, 68, 70, 71, 72, 74, 75	35 U.S.C. § 103; these claims are obvious over *Hardware Design and Implementation of IP-over-1394 Protocol Stack and Its Evaluation* (Yusairi) in view of Shin