

Kiersten Batzli

From: AFactor@susmangodfrey.com
Sent: Monday, September 30, 2024 4:46 PM
To: Claire Chang; External Service - Haptic Counsel
Cc: Service - FR Apple/Haptic
Subject: RE: Haptic, Inc. v. Apple Inc. - IPR Petitions

[This email originated outside of F&R.]

Claire,

Haptic does not agree to Apple's proposal. Thanks and happy to discuss.

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From: Claire Chang <cchang@fr.com>
Sent: Wednesday, September 25, 2024 3:29 PM
To: External Service - Haptic Counsel <ExternalServiceHapticCounsel@fr.com>; Ace Factor <AFactor@susmangodfrey.com>
Cc: Service - FR Apple/Haptic <ServiceFRAAppleHaptic@fr.com>
Subject: Haptic, Inc. v. Apple Inc. - IPR Petitions

EXTERNAL Email

Counsel,

Apple will soon be filing one or more IPR petitions to invalidate claims of the '738 patent. Before doing so and to potentially streamline issues in the IPR process, please let us know if Haptic will covenant not to sue all Apple entities, upstream suppliers, etc., and downstream distributors, customers, etc., for any Apple product, including the accused products included in Haptic's May 30 Infringement Contentions, for any claims of the '738 patent not asserted in your May 30 Infringement Contentions (i.e., all claims other than claims 1, 2, 4, 5 and 9). Please let us know your response by September 27, 2024.

Please let us know if you have any questions or want to discuss.

Thanks,
Claire

Claire Chang

Associate ■ Fish & Richardson P.C.

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