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VIA E-MAIL

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**Re: *BSD Crown, Ltd. v. Amazon.com, Inc.*, Case No. 3:24-cv-03503-JD (N.D. Cal.); and
Amazon.com, Inc. v. B.S.D. Crown, Ltd., IPR2025-00057**

Counsel:

In connection with IPR2025-00057, Petitioners Amazon.com, Inc., Amazon Web Services, Inc., and Amazon.com Services LLC (collectively, “Petitioners”) hereby stipulate and agree that, if the PTAB institutes an *inter partes* review proceeding (“IPR”) for U.S. Patent No. 8,934,887 on the grounds presented in Petitioners’ petition, Petitioners will not pursue an invalidity defense in *BSD Crown, Ltd. v. Amazon.com, Inc.*, Case No. 3:24-cv-03503-JD (N.D. Cal.) that the patent claims subject to the instituted IPR are invalid based on the same grounds as in the petition or any grounds that could have reasonably been raised in the petition. This stipulation is limited to the grounds in the petition and those that could have reasonably been raised in the petition and is not intended to—and should not be construed to—limit Petitioners’ ability to assert invalidity of any claims of the ’887 patent on any other ground.

Very truly yours,



Jessica C. Kaiser

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