

From: [Daniel Leventhal](#)
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Cc: [Brett C. Govett](#); [Peter M. Hillegas](#); [Brett McKean](#)
Subject: Autoscribe Corporation v. Nuvei Corporation, et. al., Case No. 2:24-cv-00325, in the United States District Court for the Eastern District of Texas, Marshall Division
Date: Monday, March 24, 2025 6:05:31 PM

Counsel,

Defendants Nuvei Corporation, Nuvei Technologies Corp., Nuvei International Group Limited, and Nuvei Limited (collectively "Defendants") hereby stipulate that if the Patent Trial and Appeal Board institutes IPR on IPR2025-00089, then Defendants will not pursue in this district court case the specific grounds identified above that were raised in the IPR, or any other ground that reasonably could have been raised in the IPR (i.e., under 35 U.S.C. §§ 102 or 103 on the basis of prior art patents or printed publications).

This stipulation is not intended, and should not be construed, to limit Defendants' ability to assert invalidity of the asserted claims of the '621 Patent in this case on any other ground (e.g., invalidity under 35 U.S.C. §§ 101, 112), regardless of whether inter partes review is instituted.

Thanks,
Daniel

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