Jeffrey Jiang

From: Jeffrey Jiang
Sent: Monday, May 5, 2025 5:05 PM
To: Michael Boyea; George Lee; Rory Shea; Sean Sullivan; Dan Smith; Andrew Gerla; Jae Pak; Rovner, Philip A.; Moshos, Andrew M.; Cole Richter; LS3 Team; Singleton, Melissa A.
Cc: SKLinkplay; Linkplay-Bayes; meimark-linkplay@meimark.com; Jeff Pearson; Guang-Yu Zhu; ariley@meimark.com; Jeffrey Jiang
Subject: Linkplay Technology Inc. v. Sonos, Inc., IPR2025-00509

Counsel,

Linkplay Technology Inc. and Linkplay Technology, Inc., Nanjing (collectively "Linkplay") agrees that if IPR2025-00509 is instituted, Linkplay will not pursue in the related District Court Litigation (*Sonos, Inc. v. Linkplay Technology Inc.*, Case no. 1:24-cv-00131 (D. Del.)) the following invalidity challenges to U.S. Patent No. 10,853,023 relying on 35 U.S.C. §§ 102, 103: (1) any ground raised or that could have been reasonably raised in IPR2025-00509, as well as (2) any ground based on corresponding system prior art. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (PTAB Dec. 1, 2020) (Precedential).

Best,
Jeff

Jia Hui (Jeffrey) Jiang
Attorney*
Bayes PLLC | www.bayes.law
8260 Greensboro Drive, Suite 625 | McLean, VA 22102
O (703) 995-9887 | F (703) 821-8128 | jeffrey.jiang@bayes.law

*Practicing under the supervision of Virginia admitted attorneys.