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April 21, 2025

VIA E-MAIL

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Re: ***Mobile Data Technologies LLC v. Samsung Electronics Co., Ltd., et al.,*** **Case No. 2:24-cv-00435-JRG-RSP (E.D. Tex.)**

Dear Counsel:

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Samsung") hereby stipulate, consistent with the stipulation made by the Petitioner in *Sotera Wireless Inc. v. Masimo Corp.*, IPR2020-01019, that if the Patent Trial and Appeal Board ("PTAB") institutes an *inter partes* review ("IPR") in either or both of IPR2025-00537 and IPR2025-00538 concerning U.S. Patent No. 8,135,801, then Samsung will not pursue in this litigation the grounds raised or any other grounds that could have reasonably been raised before the PTAB in the instituted proceeding(s).

Regards,

/s/ Douglas J. Kline

Douglas J. Kline