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Subject: IPR2025-00748 and IPR2025-00749 – Motions for Joinder
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Dear Honorable Board,

Petitioner and Patent Owner have met and conferred regarding Patent Owner's Response to Motion for Joinder in IPR2025-00748 and IPR2025-00749 (Paper 6 in both proceedings). Patent Owner has agreed not to oppose Petitioner's motions for joinder to IPR2024-01110 and IPR2024-01111 provided that Petitioner agrees to the below conditions.

Petitioner ZF Active Safety and Electronics US LLC ("ZF") hereby agrees to the following additional conditions on its understudy role for IPR2025-00748 and IPR2025-00749, so long as Petitioner Mobileye Global, Inc. ("Mobileye"), remains an active party in IPR2024-01110 and IPR2024-01111 ("the Mobileye IPRs"):

- ZF will rely upon the expert testimony submitted by Mobileye and will not seek to add additional expert testimony unless Mobileye is terminated prior to any necessary depositions;
- ZF will not seek to extend or expand the word-count limits for any papers filed in the joined IPRs;
- ZF will not serve any discovery requests in connection with the Mobileye IPRs;
- ZF will seek Board authorization to file any arguments or evidence relating to the merits in the Mobileye IPRs;
- Counsel for ZF will not participate in a speaking role in any telephone conference before the Board in the Mobileye IPRs, except for matters relating to the joinder;
- Counsel for ZF will not participate in oral argument in the Mobileye IPRs; and
- Counsel for ZF will not participate in any speaking role in any deposition in the Mobileye IPRs.

If the Board desires a conference call to discuss the joinder, the parties can confer to propose times of joint availability.

Respectfully,

John Hutchins

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