

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

FERID ALLANI,
Patent Owner

Inter Partes Review Case No. IPR2025-00857
U.S. Patent No. 10,943,058

**PETITIONER APPLE INC.'S NOTICE OF BROADENED
SOTERA PLUS STIPULATION**

Petitioner Apple Inc. (“Petitioner”) hereby stipulates, broader than the stipulation made by the Petitioner in *Sotera* that, if the PTAB institutes Petitioner’s Petition for IPR against U.S. Patent No. 10,943,058 (and does not subsequently vacate institution), Petitioner will not pursue in litigation against the claims challenged in IPR2025-00857: (i) the specific grounds raised in IPR2025-00857, (ii) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications), or (iii) any ground based on a combination of system prior art and the references asserted as part of a ground raised in IPR2025-00857, as reflected in the table summarizing the Statutory Grounds for Challenges on page 4 of the Petition.

Moreover, Petitioner agrees that if IPR is instituted, Petitioner will not pursue in the related district court litigation any system art prior art theory that is coextensive with prior art presented to the Board.

Respectfully submitted,

BY: /s/ Adam P. Seitz

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Hunter A. Horton, *pro hac vice* to be
submitted

COUNSEL FOR PETITIONER