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VIA EMAIL

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Re: *VB Assets, LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 2:24-cv-00828-JRG

Dear Counsel,

As you know, Petitioners have filed IPR petitions challenging each of the six patents identified below. In view of recent Board decisions, Petitioners are updating their Sotera stipulations relative to each proceeding as set forth below.

If the PTAB institutes an inter partes review in:

- IPR2025-00866 concerning U.S. Patent No. 8,073,681
- IPR2025-00867 concerning U.S. Patent No. 7,818,176
- IPR2025-00868 concerning U.S. Patent No. 8,515,765
- IPR2025-00869 concerning U.S. Patent No. 8,886,536
- IPR2025-00870 concerning U.S. Patent No. 10,755,699
- IPR2025-00871 concerning U.S. Patent No. 10,510,341

then Petitioners will not pursue in Texas district court litigation (*VB Assets, LLC v. Samsung Electronics Co., Ltd. et al.*, Case No. 2:24-cv-00828) the grounds raised or any other grounds that could have reasonably been raised before the PTAB in the instituted proceeding(s) for that patent.

In addition, if IPR is instituted in anyof the petitions, then Petitioners will not pursue in the related district court proceeding combinations of the prior art asserted in the corresponding IPR proceeding(s) with unpublished system prior art for the patent(s) on which IPR has been instituted. Moreover, Petitioners

agree that if IPR is instituted in any petition, they will not pursue in the related district court litigation any commercial prior art theory that is coextensive with prior art presented to the board for the patent(s) on which IPR has been instituted.

Petitioners position will be reflected in their briefs opposing Patent Owner's request for discretionary denial in IPR2025-00866, IPR2025-00867, IPR2025-00868, and IPR2025-00869. In these briefs, we anticipate including a footnote stating that Petitioners would not oppose a request by Patent Owner for a three-page reply to address this more restrictive stipulation.

Very truly yours,

/s/ Douglas J. Kline
Douglas J. Kline