

Wayne Zou

From: Gass, Christopher J. <cgass@leydig.com>
Sent: Wednesday, May 28, 2025 12:31 AM
To: Fussell, Tripp; Miller, Tiffany A.; Buccigross, Gray M.; Bakewell, Clark S.; Geoff Culbertson (EXTERNAL CONTACT); Krawice, Courtney; Kelly Tidwell (EXTERNAL CONTACT)
Cc: Airan, David; Mueller, Wesley; Filbin, Paul; Schubert, Mike; Sanner, James; blake
Subject: Pantech v. OnePlus, No. 5:24-cv-00038-RWS-JBB - Stipulation as to IPR2025-00887

Counsel,

OnePlus Technology (Shenzhen) Co., Ltd. has filed an IPR petition ("Petition") with the Patent Trial and Appeal Board (PTAB) to challenge the validity of claims 1-4, 7-11, and 14 of U.S. Patent No. 8,995,372 ("372 Patent") in IPR2025-00887. In the Petition filed on May 6, 2025, OnePlus stipulated that, should the PTAB institute review of the Petition, it would not pursue in this district court litigation any grounds that were raised or reasonably could have been raised in the IPR.

OnePlus hereby further stipulates that, should IPR2025-00887 be instituted, OnePlus would not pursue in this district court litigation any invalidity grounds under 35 U.S.C. §§ 102 and 103 against the '372 Patent—including those grounds with system prior art.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-00887, OnePlus reserves the right to assert any grounds of invalidity in this district court litigation against the '372 Patent.

Regards,
Chris

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