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Via E-Mail

June 4, 2025

Matthew P. Mosteller
Principal
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CALDWELL CASSADY & CURRY P.C.
2121 N Pearl Street
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Re: *Collision Communications, Inc. v. Lenovo Group Limited 2:23-cv-00594 (EDTX)*

Counsel:

Defendant Lenovo Group Limited (“LGL”) is a real party-in-interest to a petition for *inter partes* review (IPR2025-00927) filed with the Patent Trial and Appeal Board (PTAB) to address the patentability of claims 1-3, 5-13, and 15-17 of U.S. Patent 7,593,492.

I write to inform you that LGL hereby stipulates that, if the PTAB institutes review in IPR2025-00927, LGL will not pursue in the above-captioned District Court litigation the specific grounds asserted in IPR2025-00927, or any other ground that could have been reasonably raised in IPR2025-00927 (i.e., any ground that could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications). *See Sotera Wireless, Inc. v. Masimo Corporation*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020). LGL also stipulates that, if the PTAB institutes review in IPR2025-00927, LGL will not pursue in the above-captioned District Court litigation combinations of the prior art references asserted as part of a ground in this proceeding, as listed below, with unpublished system prior art or any other type of prior art. *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025). Accordingly, LGL hereby stipulates that, if the PTAB institutes review in IPR2025-00927, LGL will not pursue in the above-captioned District Court litigation combinations of any of the McElwain, Wang, Sampath, Mills, or Liu references asserted as part of the grounds of IPR2025-00927 with unpublished system prior art or any other type of prior art.

In so stipulating, LGL seeks to avoid multiple proceedings in different forums addressing the validity of the instituted claims based on the same grounds or prior art. The tables in attached Appendix A list the grounds and ground references asserted in IPR2025-00927.

For the sake of clarity and to avoid any doubt, if the PTAB declines to institute IPR2025-00927, LGL reserves the right to assert any grounds of invalidity in the above-captioned District Court proceeding against U.S. Patent 7,593,492.

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Sincerely,

A handwritten signature in black ink, reading "Matthew Mosteller". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Matthew P. Mosteller

***Attorney for Defendant
Lenovo Group Limited***

Appendix A – Grounds and Prior Art References

Ground	Claims	Basis
1A	1-3, 5-13, 15-17	McElwain-Wang
1B	1-3, 5-13, 15-17	McElwain-Sampath
2A	1-3, 5-13, 15-17	Mills-Liu
2B	10-13, 15, 16	Mills-Liu-Sampath

Ground Reference	Details
McElwain (EX1004)	U.S. Publication No. 2004/0213360
Wang (EX1005)	International Publication No. WO2006/092090
Sampath (EX1006)	U.S. Publication No. 2007/0060061
Mills (EX1007)	U.S. Publication No. 2003/0193966
Liu (EX1008)	U.S. Publication No. 2006/0188031