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Subject: IPR2025-01015 (US 7,930,575)
Date: Tuesday, July 15, 2025 12:30:00 PM

Collabo Counsel,

Qualcomm Inc. and Qualcomm Technologies, Inc. (Qualcomm) hereby stipulate that, if the Patent Trial and Appeal Board institutes *inter partes* review proceedings for U.S. Patent No. 7,930,575 based on IPR2025-01015, then Qualcomm will not pursue an invalidity defense in *Collabo Innovations, Inc. v. Qualcomm, Inc.*, 6:24-cv-00472 (W.D. Tex.) that the claims of the '575 Patent subject to the instituted IPR are invalid based on grounds that were raised or reasonably could have been raised in the instituted IPR petition and any grounds that include any prior art references relied upon in any of the grounds in the IPR petition. For clarity, the prior art references relied upon in the grounds of the IPR petition are listed below:

- US 7,293,183 (Lee)
- US 7,219,248 (Shikata)
- US 7,664,970 (Jahagirdar)
- US 5,530,879 (Crump)
- US 5,502,689 (Peterson)
- US 7,369,815 (Kang)
- US 7,167,991 (Higadisha)
- US 5,390,350 (Chung)

Regards,

Anupam

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