From: Jeremy Monaldo
Sent: Saturday, July 12, 2025 4:31 PM
To: PTAB
Cc: Peter Lambrianakos; Vincent Rubino; Alfred Fabricant; jmercadante@fabricantllp.com; jpymento@fabricantllp.com; IPR50095-0244IP1
Subject: Petitioner Stipulation - IPR2025-01070

Counsel,

Petitioner Apple Inc. filed a petition for *inter partes* review (IPR) with the Patent Trial and Appeal Board (PTAB) in the subject proceeding (IPR2025-01070).

Apple hereby stipulates that, if the PTAB institutes review in this proceeding, in *Advanced Coding Technologies, LLC v. Apple Inc.*, Case Nos. 2:24-cv-00572-JRG and 2:24-cv-00687-JRG ("the Texas Litigation"), Apple will not pursue the specific grounds asserted in *inter partes* review in this proceeding, or any other ground that could have been reasonably raised in this proceeding (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). Apple also stipulates that, if the PTAB institutes review in this proceeding, Apple will not pursue in the Texas litigation combinations of the prior art asserted in this proceeding with any other type of prior art, including unpublished system prior art. *See Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025).

In so stipulating, Apple seeks to avoid multiple proceedings in different forums addressing the validity of the instituted claims based on the same grounds or prior art. For the sake of clarity, and to avoid any doubt, if the PTAB declines to institute (or withdraws institution) in this proceeding, the conditions supporting the above stipulations will be unmet and the stipulation shall be considered null and void.

Respectfully,
Jeremy J. Monaldo

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Apple v. Advanced Coding Techn.
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